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GETTING A SEAT AT THE TABLE:
A ROLE FOR THE STATE HISTORIC PRESERVATION PLAN

Lyssa Djuna Papazian

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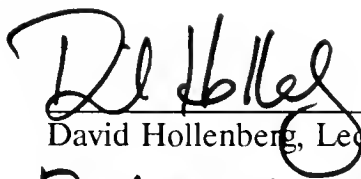
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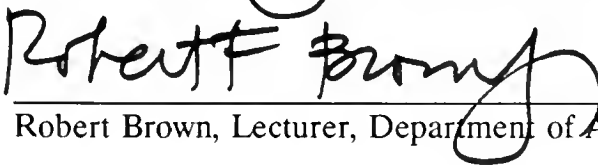
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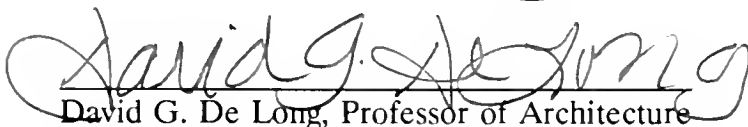
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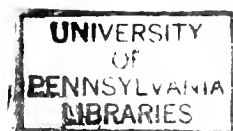
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TABLE OF CONTENTS

List of Figures	iii
Thesis Statement	iv
Chapter One : Introduction	1
Chapter Two : Preservation Planning	13
Chapter Three : The State Historic Preservation Plan	31
Chapter Four : Preservation and Comprehensive Planning	60
Chapter Five : Case Studies (Connecticut and Georgia)	71
Chapter Six : Conclusion	90
Bibliography	105

LIST OF FIGURES

Figure 1 : "RP3" Planning Flow Chart - 1980	38
Figure 2 : National Conference of State Historic Preservation Officers Planning Flow Chart - 1988	50
Figure 3 : National Park Service Planning Flow Chart - 1991	51

The state historic preservation plan , though frequently undertaken to satisfy bureaucratic or administrative obligations, can and should become a key tool in the integration of preservation with mainstream land use concerns .

As has been widely proclaimed by preservationists, historic preservation is fundamentally a quality of life issue. The broader but related field of land-use planning is similarly driven by quality of life issues which is why preservation, as a segment of that concern and a land-use, must become as much a part of land use planning's decision-making and advocacy as any other segment. But preservation, unlike urban design or environmental concerns, has for the most part remained separate, operating in its own sphere and on its own terms.

At the 1991 joint National Trust for Historic Preservation and National Park Service conference, it was widely proclaimed that preservation should start to concentrate on bridging these gaps through promotion, education, and partnership-building. In his capacity as the National Park Service's Chief of Preservation Planning, deTeel Patterson Tiller has expressed that preservation needs to "get a seat at the table." The state historic preservation plan can be an important means to that end, both through the planning process and through the planning document.

The state historic preservation plan is currently a fixture of all state

level public preservation programs. This results from the fact that such plans have been required, since enactment of the 1966 National Historic Preservation Act, in order for a state to receive critical federal funding for its State Historic Preservation Office. As the lead federal agency participating in and guiding the state - federal preservation partnership set up by the 1966 Act, the National Park Service has seen the potential of the state historic preservation plan to play an alliance-building role amongst the greater preservation constituency. Since 1983, with the publication of the Secretary of the Interior's Standards for Historic Preservation, the Park Service has increasingly advocated that the state plan be formatted and used to both promote preservation and to influence land-use decision-making in each state. However, the state plans have frequently been hampered by conflicts between the Park Service and the State Historic Preservation offices, by a lack of planning expertise and guidance, or by the fiscal limitations of the state Historic Preservation offices.

This thesis examines the background and evolution of the state historic preservation plan in order to suggest ways that it could become a more useful and even powerful alliance-building tool. Alliance-building, as the term is used in this thesis, is extending influence and building support with others, especially those with related or overlapping interests. It is important to the future of preservation and planning is the main vehicle for achieving it.

Educating the public and the government about preservation is a way of developing more support, both financial and political. The promotion of preservation goals and reaching out to decision-makers about how

preservation can plug in to their concerns is a way of extending influence. Partnerships between public and private preservation, and between preservation and other concerns further broadens support and influence. Alliance-building includes all of the above, and is at least as important an outgrowth of preservation planning as the preservation of historic resources.

In order to show how the state preservation plan can be a tool for alliance-building, this thesis has been organized in the following way:

Chapter 1 : Introduction - An introductory discussion of preservation's development towards alliance-building and the key role that preservation planning has played in this development. Definitions of relevant planning terms are provided.

Chapter 2 : Preservation Planning - A discussion of the evolution of preservation planning focuses on an assessment of its current importance for the future.

Chapter 3 : The State Historic Preservation Plan - A discussion of the state historic preservation plan focuses on its conception as a part of the national preservation program and the history of the difficult relationship between the State Historic Preservation Offices and the National Park Service.

Chapter 4 : Preservation and "Comprehensive Planning" - The preservation plan as defined above will be compared to "comprehensive" planning in

general to see how it fits into the larger sphere or how it appears to others at the “table.”

Chapter 5 : Case Studies - Two case studies of state plans, Connecticut and Georgia, will be examined to illustrate different responses to the Park Service’s planning interpretation and the challenge to “get a seat at the table.”

Chapter 6 : Conclusion - A discussion of an ongoing state planning process, in New Jersey, using the conclusions drawn from the histories, comparisons, and case studies, will highlight how the plan could be used as an alliance-building tool, both in New Jersey and in general.

CHAPTER ONE

INTRODUCTION

When, in 1966, a concerned group of preservationists and legislators gathered to contemplate the movement and to address its future, there was a recognition that preservation should expand toward the mainstream arena of public planning and regulation. Yet at the same time, the energy associated with the grass-roots private action that was at the core of preservation's beginnings as a movement was cherished and promoted as well. These two threads - one essentially public and bureaucratic in a neutral sense and the other largely private and reactive or ad-hoc - have continued to weave in and out of the preservation network. The people driving both the public and the private components largely emerge from a common background and bring a similar set of values and passion for resources to historic preservation. These activist values have, in many ways, kept preservation on the level of a movement instead of a professional field.

Efforts to professionalize and to become a part of the governmental regulatory structure have yielded professional degree programs in preservation, and major legislation such as the National Historic Preservation Act¹, the tax credit for historic rehabilitation², and a plethora of local preservation ordinances. Yet from speaking with many preservationists in government offices, it appears that their hearts are with the grass roots activism that drives the advocacy of local and private, non-profit preservation groups. In other words, although historic preservation as a movement has sought governmental authority and a place in the public

sector planning world, it has not let go of its ad hoc and passionate roots. This is both good and bad. Preservationists have resisted bureaucratization in its worst sense and have remained committed and innovative on many levels, yet they have not learned how to become “players” in the game and “take a seat at the table”.

In an interview with the author, deTeel Patterson Tiller, Chief of the planning branch of the National Park Service’s Interagency Resources Division, and responsible for the planning oversight of the SHPOs, suggested that Congress had in fact contemplated, when it enacted the National Historic Preservation Act in 1966, that preservation should become a planning force. Historic preservation was to become another element within the broader sphere of public planning, just as transportation, housing or agriculture were. The envisioned transformation of the fringe movement into a mainstream field has, in the opinion of Tiller, never really occurred, and preservation concerns have suffered for it.³

The Preservation Planning Branch of the Park Service published its “Action Agenda for the 1990s: Historic Preservation Planning in National Register Programs” in 1990 which stated as one of its goals:

“To empower SHPOs to ‘get a seat at the table’ where Federal, State, and local land-use planning decisions are made, in order to improve opportunities for resource preservation.”⁴

Tiller has made the phrase “get a seat at the table” part of the ongoing preservation planning dialog. At the the 1991 joint Historic Preservation Conference of the National Trust for Historic Preservation, the National Park Service and the Advisory Council on Historic Preservation, the goals articulated collectively by both public and private sector participants reflect

some of the problems that a lack of transformation has caused. These are the improved promotion of preservation's goals, the broadening of preservation's political base of support, and the pursuit of alliances and collaborations with other forces⁵. This most recent iteration of the need for alliance building and promotion is, of course, an indication that by and large it has not yet happened. There have been many successes of the organized preservation movement in this country, but alliance-building and dispersing a preservation ethic to broader planning concerns have not been among them.

By comparison with preservation, the environmental movement, which also sought to become a mainstream planning force with the passage of the National Environmental Policy Act (NEPA) in 1970, has been much more successful in this. According to Tiller, environmentalists have largely succeeded in becoming "players" where preservationists have not. Their success may in part be due to the fact that their concerns could be supported by science which lent a weight to their cause, that their goals are readily understandable, and also to using a common language with planners. Perhaps they were already in a better position when the NEPA was passed. As John Fowler has observed in the 1987 book *American Mosaic : Preserving a Nation's Heritage* :

"By comparison (with the environmental movement in the 1970s) Historic Preservation was a relatively small program, growing in support, sophistication, and effectiveness but lacking truly widespread recognition & public involvement."⁶

Since 1966, when the National Historic Preservation Act was passed, planning, in the form of a comprehensive statewide preservation plan, has

been an intrinsic part of the governmental preservation program. For 25 years, the state plan has been an element of the requirements governing federal support for state preservation offices. However, in response to these requirements, preservationists created their own system of data collection and management which they then called "planning," instead of applying established planning principles to preservation activities.

The need to assimilate preservation efforts into the mainstream of public planning as well as the need to retain the effectiveness of passionate advocacy are both important for historic preservation, yet are not always comfortable bedfellows. The reticence of preservationists to really explore traditional planning methods may be rooted in a fear of losing that passion which is identified with the movement's roots and which has served so successfully so far.

A summary of the 1991 joint Historic Preservation Conference of the National Trust for Historic Preservation, the National Park Service and the Advisory Council on Historic Preservation, revealed that the participants strongly felt that preservation must become a mainstream rather than a fringe concern.⁷ However, as one of the highlights identified in the "Executive Summary" of the same conference, another overwhelming sentiment was revealed to be that preservation needs to reclaim and emphasize its activist, grass roots and steer away from a brewing bureaucracy.⁸ In what seems like a major backlash, the movement wants to remain a movement and recoil from the hard-earned progress towards professionalism. It wants to continue to embrace the local high pitched battle and reject the broadly governmental and the quiet give and take of regulation. Preservation could rather start to exploit the opportunities

afforded by its essential multi-disciplinary nature and explore the positive possibilities of a mainstream alliance.

Must preservation then, like the environmental movement, utilize “science” before it can be a mainstream “player”? The field of city and regional planning, which uses scientific methods, is a useful model to look at in order to gauge the progress of the historic preservation movement in establishing itself.⁹ While land-use laws, such as zoning, began being enacted in the 1920’s, it was not until the 1950’s that master or comprehensive planning began to provide a framework for the laws. It has certainly taken even longer for city and regional planning to truly become established as fields commensurate with professional training and well-articulated standards. Arguably, in many parts of the U.S., planning is in fact perceived as being just as much on the fringe today as preservation often appears to today’s planners. During its educational and academic evolution city planning developed accepted standards that made the term “planning” definable and predictable. The American Planning Association, as a professional organization helps to maintain and update those standards and provides, with its publications, many forums for professional and academic debate on planning theory.

As one finds with historic preservation, many of the pioneers of city planning were architects. In histories of the planning field in America, architect Daniel Burnham and landscape architect Frederick Law Olmstead are often credited with being among the primary contributors to the creation of the modern concept of city planning in the late 19th century with the City Beautiful movement. These men were interested in buildings and parks - they were urban designers concerned with physical planning not unlike

preservation “planners” who are involved in “bricks and mortar” preservation projects. They thought big, but their plans were not based on analyzed data. A concurrent trend, also credited with contributing to the birth of modern planning, was the social reform movement spearheaded by Jacob Riis and others like him. The marriage of the two sources established urban planning as an overall quality of life issue not just an aesthetic one. Similarly, the creation of local preservation ordinances and districts married the notion of community vitality and health to the protection of historic properties, thus making historic preservation a quality of life issue.

By comparison to city planning, historic preservation is a young field that, assuming a similar development, might not expect to achieve fuller influence for another 30 to 40 years. Historic preservation planning has lacked for a comparable defined and predictable framework within which to work. Nor has preservation until quite recently had professional literature such as a journal.¹⁰ As the opinions of deTeel Patterson Tiller suggest, the Park Service is now making moves towards advocating a much more professional approach to preservation planning, the most notable of which is the development of a collaboration and alliance with the American Planning Association. The state-level government agencies which the Park Service oversees, however, are often ill equipped and unprepared to take on the task of moving preservation planning into a larger sphere. What is required to fulfill this vision is essentially the re-tooling and re-thinking of statewide preservation planning and of professional qualifications.

With the phrase “getting a seat at the table” Tiller is suggesting that the major planning considerations which drive our land-use policy, legislation, and public works, such as housing, transportation, economic development,

and environmental concerns, are communicating at the planning “table” and are influencing one another. He argues that preservation must become one of those considerations and start to forge real alliances with other land use concerns and disciplines.

Tiller is not a pioneer. In the past, there have been “gadfly” preservationists exhorting their colleagues to essentially move closer to the table and take a seat, such as Chester Liebs, who at the 1979 National Trust conference in Williamsburg, asked his audience:

“Is historic preservation about to die?... Or is a preservation ethic near at hand - that is, in a few years will conservation of the built environment become part of the mainstream, thus eliminating the need to further articulate separate values and advantages?”¹¹

The first twenty-five years of preservation laws, regulations, governmental organizations, and training can be viewed as the formative stage of a much longer evolution towards building a nationwide preservation ethic. Tiller and the Park Service now want to help preservation move to the next stage - alliance-building. Instead of standing at the side of the table and occasionally jumping up and down for attention, preservationists need to learn how to take a seat and speak in an understandable language.

There is some disagreement and resistance to this approach. Especially now, when many state and local governments are in financial straits, many preservationists feel it is a time to circle in the wagons and rely on tried and true techniques - many of which are reactive rather than pro-active. However, it is important to recognize that evolution is a slow process and not easily forced, and that for many years, preservation has been moving slowly in the direction of broader planning and alliance-building. The recent

advocacy coming from Tiller and the National Park Service may in fact have a catalytic effect on the governmental network. However, the difficulties which have surrounded the state historic preservation plan raise the question: is the larger preservation constituency ready to pick up the challenge?

What is Planning?

To begin a discussion of preservation planning, it is important to recognize that in the literature of historic preservation, the term, "planning," has been used very loosely and for the most part without any attempt at definition. For the purposes of this thesis, the term needs to be defined both as it is currently understood by the planning profession and how it will be used in the subsequent analysis of the thesis.

In an attempt to fill a void in planning literature devoted to State and regional planning, Frank S. So, Irving Hand, and Bruce D. McDowell have edited a textbook entitled, *The Practice of State and Regional Planning*, which includes an explanatory chapter on the planning process. McDowell, the author of this chapter entitled "Approaches to Planning," writes:

"Planning involves visualizing a better future and going after it. Another way to say this is that 'A plan is a predetermined course of action.' 'A plan must have three characteristics. First, it must involve the future, Second, it must involve action. Third there is an element of personal or organizational identification or causation...'"¹²

With the collaboration of the American Planning Association, the Park Service published a "Concept Paper" on "Historic Preservation Planning" in



1991. An explanation of preservation planning, it begins with a basic definition of planning:

“Planning is a process of gathering and analyzing information, and projecting into the future; a process of figuring out where we are, where we want to go, and how to get there.”¹³

A plan is a strategy for action. Two of its most important features touched on in these definitions are that it is pro-active and that it takes a step back from the subject to gain perspective. This is true whether it refers to a single building’s rehabilitation or to a statewide preservation program. The analysis of data in order to draw conclusions is also a basic criteria for planning because it leads to decision-making.

The data that forms the basis for planning, is well in place for preservationists. They have spent the last twenty-five years collecting data and improving their data-gathering techniques. But the synthesis of that data and the hard choices and questions that must ensue alarm most preservationists. Planning theorist Andreas Faludi has written that

“...the essential role of planning (is that of) making decisions. A decision-taker presented with a multitude of arguments made by the advocates of particular courses of action is faced with the problem of judging which course of action to accept as worth implementing. He must resolve, if only tentatively, to accept some reasons put before him as valid grounds for adopting one line in preference to others.”¹⁴

This is in fact what planning is - the making of hard choices based on data collected. Tiller emphasizes that preservationists must begin to make these choices as part of their coming of age and that if they don’t, others will make the choices for them.

M. Christine Boyer, a professor of planning, has articulated a way of

looking at “planning discourse” in her 1983 book, *Dreaming the Rational City : The Myth of American City Planning* . She has defined the “apparatus of planning” in terms of Michel Foucault’s writings on discourse:

“The discourse on planning should not search for cause and effect. Instead what holds our attention is the apparatus of planning: what Foucault has defined as the relationships among a set of distinct elements such as professional discourse, governmental institutions, administrative procedures, regulatory laws, legal concepts, architectural forms and plans, scientific statements, and moral proclamations. ...”¹⁵

Boyer’s book describes an evolution from America’s rural based social order to an urban and industrially based order which in itself gave rise to city planning as a collection of tactics and strategies to combat urban evils and create urban utopias. Between all the tactics and strategies are the relationships she writes about, which she believes are the true realm of planning.

Historic Preservation has its own evils to correct, its own utopias to achieve, and comes with its own set of tactics and strategies. It is in the relationships to other agendas and other tactics that true preservation planning lies. This is the planning of alliance building and of influencing others, of long-term strategy and choice-making that Tiller is now urging on the state preservation offices, rather than a planning of data and resource management. In this thesis, the term “planning” refers to the process of analysis, strategizing, decision-making, and finally alliance-building and communication.

¹ Public Law 89-665, October 15, 1966, "The National Historic Preservation Act," [80 STAT 915ff]; Amended in 1980 by Public Law 96-515.

² Public Law 94-455, "Tax Reform Act of 1976," Title XXI: Sec.2124 " Tax incentives to encourage the preservation of historic resources," [90 STAT 1916], Amended in 1986 by "Tax Reform Act of 1986," Public Law 99-514 [100 STAT 2085].

³ In the original NHPA, itself, there is only a suggestion of this in the duties assigned the Advisory Council on Historic Preservation:

"Sec. 202 (a) (1). Advise the President and the Congress on matters related to historic preservation; recommend measures to coordinate activities of Federal, State, and local agencies and private institutions and individuals relating to historic preservation.. Sec.202(a)(3). recommend the conduct of studies in such areas as the adequacy of legislative and administrative statutes and regulations pertaining to historic preservation activities of State and local governments and the effects of tax policies at all levels of government on historic preservation;..." (Public Law 89-665, October 15, 1966, "The National Historic Preservation Act," [80 STAT 918])

The 1980 Amendments articulate the sentiment more explicitly in the expanded purpose section :

" Sec. 1(b) (6). The Congress finds and declares that...the increased knowledge of our historic resources, the establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of Federal and federally assisted projects and will assist economic growth and development;..." (Public Law 96-515, "The 1980 Amendments to the National Historic Preservation Act", as reproduced in the 1983 edition of *With Heritage So Rich* , by the National Trust for Historic Preservation, Landmark Reprint Series, Washington,DC: The Preservation Press, 1983 [originally pub. 1966],200.)

Notable features of both versions of the National Historic Preservation Act are that partnerships and alliances are very much a part of the intended decision-making and management of the preservation program and that traditional planning tools, such as analytical studies, surveys and comprehensive plans are included as part of the Act's implementation.

⁴ National Park Service, Interagency Resources Division, Preservation Planning Branch, "NPS Action Agenda for the 1990s: Historic Preservation Planning in National Register Programs," October 1990, 1.

⁵ Information from: National Trust for Historic Preservation, "The 45th National Preservation Conference, San Francisco, California, October, 1991: A Summary" by Peter H. Brink and H. Grant Dehart, 1992.

⁶ John M. Fowler, "The Federal Government as Standard Bearer," In *The American Mosaic: Preserving a Nation's Heritage* , Edited by Robert E. Stipe and Antoinette J. Lee (Washington D.C.: US/ICOMOS, 1987),43.

⁷ National Trust for Historic Preservation (Brink and Dehart).

⁸ "The Grassroots count: Local preservationists started the movement and continue to be its heart. More needs to be done to keep the local focus and leadership of the movement in the forefront. Preservation programs need to be more accessible to grassroots preservationists." (National Trust for Historic Preservation, "Executive Summary of the Findings and Recommendations, 45th National Conference," by Brink and Dehart, San Francisco, December 12, 1991),1.

⁹ History of planning drawn from : Mel Scott, *American Planning since 1980: A History Commemorating the 50th Anniversary of the American Planning Association* , (Berkeley and Los Angeles: University of California Press, 1969), and Frank S. So, Irving Hand, Bruce D. McDowell, eds., *The Practice of State and Regional Planning* (Washington DC: The American Planning Association, 1986).

¹⁰ The National Trust for Historic Preservation publishes a journal of preservation called the *Historic Preservation Forum* as well as a "Preservation Policy Research Series."

¹¹ Chester Liebs, "Developing a Preservation Philosophy," In National Trust for Historic Preservation, *Preservation: Toward an Ethic for the 1980s* (Washington DC: Preservation Press, 1979), 162.

¹² Frank S. So, Irving Hand, Bruce D. McDowell, eds., *The Practice of State and Regional Planning* (Washington DC: The American Planning Association, 1986), 3.

¹³ National Park Service, Interagency Resources Division, Preservation Planning Branch, "Concept Paper: Historic Preservation Planning Process," (Washington D.C., March 1991), 1.

¹⁴ Andreas Faludi, *Planning Theory*, Urban and Regional Planning Series, (Oxford, New York: Pergamon Press, 1973), 5.

¹⁵ M. Christine Boyer, *Dreaming the Rational City : The Myth of American City Planning*, (Cambridge: MIT Press, 1983), xi.

CHAPTER TWO

PRESERVATION PLANNING

To attempt to discuss how the definition of preservation planning has evolved is to recognize that, in fact, there has been aimless change rather than evolution. While the context in which the term has been used has changed in an evolutionary sort of way, throughout preservation literature there continues to be considerable inconsistency and vagueness about its meaning.

An example can be found in William Murtagh's 1988 book, *Keeping Time: The History and Theory of Preservation In America*. Although, Murtagh repeatedly refers to the "planning force" that preservation has become in relation to the land use field and local decisions affecting private property, he does not actually define the term "planning". The following quotation serves to illustrate Murtagh's own vagueness about the term he uses so often.

"The impact of American preservation in planning and development has been vast. Wires have been placed underground, street furniture has been redesigned, trees have been planted and derelict factories have been converted to housing."¹

Here, he is really writing about urban design rather than urban planning, in a way that suggests a project-oriented rather than a policy-oriented bias. Until quite recently, nothing has been specifically written to address the meaning of the words as they are used in historic preservation. The phrase "preservation planning" has been used as if it were in common usage and well understood. But current conflicts between the states and the National Park Service over the comprehensive plan show that it is anything but well-understood.

Preservation, originally, was much more a field of history and museology in which “planning” referred more to preparing architectural drawings or lists of resources than to developing policies, objectives, or strategies. As preservation has begun to engage other fields and constituents in a dialog about our shared environment, “preservation planning” has come to refer to land use policies and strategies for enhancing the quality of life. But both meanings, as well as others, have been used simultaneously.

A distinction is often made in preservation between reaction and pro-action. Many preservationists, when they use the term “planning,” simply mean acting pro-actively. Indeed that is the premise upon which the larger planning field is built - that many small reactive decisions can add up to a large negative effect, and that this effect can be avoided by pro-actively anticipating the negative effects and with greater perspective, seeking ways to avoid them. This premise is at the heart of the pivotal 1963 book *With Heritage So Rich*², which led to the passage of the 1966 National Historic Preservation Act.

The authors of *With Heritage So Rich* point out that up until that time, the majority of preservation efforts and battles were the result of passionate and personal commitments to save specific threatened buildings - an essentially reactive approach. In contrast, they pointed to the pro-active approach of survey which was used in Charleston in 1940 to identify which buildings to protect as historic. The authors pointed out that:

“ Few men marry their wives as the result of an impartial survey of a wide choice of candidates, and until recently, few buildings have been preserved as the result of a similar investigation.”³

Thus survey has been considered “preservation planning” by the simple

criteria of being a pro-active undertaking. This is still true to a certain extent today. "Survey and Planning" is a commonly used category of grants to local governments, and illustrates the close connection between the two. By this criteria for preservation planning, the federal government started "planning" with the creation of the Historic American Buildings Survey in the 1930's and the passage of the Historic Sites Act of 1935 which created a Register of National Landmarks to be identified by survey. The 1966 National Historic Preservation Act further expanded the register to include historic districts and created a new system of governmental leadership to carry on the same survey activities - and so "preservation planning" was enhanced and went on uninterrupted. This view of survey *as* planning is further reinforced by the 1983 Secretary of the Interior's Standards for Preservation Planning⁴. The Standards are based on on a planning model called the Resource Protection Planning Process which uses survey and evaluation as the key to planning. The Standards and the Resource Protection Planning Process are discussed at length in Chapter 3.

Much has been made of the idea that preservation has, in the past twenty-five years, grown from a museum-oriented concern to a quality of life concern. William Murtagh wrote in *Keeping Time...*,

" We seem to have arrived at a true acceptance of Justice Douglas' decision in *Berman v. Parker* - that it is within the power of the legislature to determine that the community should be beautiful as well as healthy...etc. Such a philosophy of planning is a far cry from the simply patriotic activities of Ann Pamela Cunningham to save a landmark in 1854 - just 100 years earlier."⁵

This change in the focus of preservation has led it towards a type of planning that is found in the land-use field, but without actually forming alliances

with the land use field. Murtagh and others have credited local preservation efforts with pushing preservation to become influential of other land-use decisions which affect historic properties.

Because there has been little discussion of the term: “preservation planning” in preservation literature, the evolution of it as a concept can only be gleaned indirectly from a look at the evolution of the preservation movement itself. Looked at in this way, the term has been defined by the context and environment in which it has been used; the attitudes of preservationists have determined what has been included in their concept of planning as well as the role that planning or strategy-making has played.

There have been significant turning points throughout the evolution of the preservation movement. Many writers on preservation have identified watershed dates which separate its history into periods of distinguishable focus and form and which aid an understanding of preservation attitudes.⁶

The 1935 Historic Sites Act is often viewed as the first major turning point in preservation efforts. Until that time the movement was almost entirely a private, reactive endeavor bolstered only by the 1906 Antiquities Act, which had given the President the power to declare a site a national treasure and to acquire it through condemnation. The Historic Sites Act went farther, creating a National Register of historic landmarks of national significance, and directing the National Park Service to identify and seek to protect those sites. The Act reinforced what had been the patriotic, museological focus of historic preservation.

The Historic American Building Survey (HABS), which was also started around this time by the Park Service largely as a make-work WPA

program, was a natural mechanism to document national landmarks. HABS created a uniform system of data collection to structure history and documentation. Between the new National Register created by the Historic Sites Act and the HABS, the federal government and, in particular, the National Park Service, became a real participant in the preservation movement. However the federal government did not play a leadership role until 1966, with the passage of the National Historic Preservation Act.

The 1930s are also significant for another turning point. Before the federal government passed its new legislation, the city of Charleston in 1931, and later New Orleans in 1936, adopted their pioneering local historic preservation ordinances. The preservation of Charleston's historic resources by way of an ordinance was a startling contrast to the recent and ongoing efforts at restoring and recreating Williamsburg, Virginia by John D. Rockefeller, Jr. and Dr. W.A.R. Goodwin. In a 1982 lecture given at the University of Pennsylvania entitled "The Background of Preservation Decisions," Charles B. Hosmer, Jr, author of two major histories of the preservation movement commented:

"Even during the Depression years it would have been impossible for one patron to carry out the restoration of a city the size of Charleston, South Carolina, That project was a collaborative venture that called upon the time and talents of a number of dedicated civic leaders in the fields of real estate, architecture, journalism, museology, and the arts."

In other words, alliance -building for preservation began in Charleston . William Murtagh also comments on this development in his book *Keeping Time: The History and Theory of Preservation in America*:

"Charleston's concept was manifold in impact. It created

a major divergence in the path of the preservation movement.”⁸

The divergence Murtagh refers to is represented by, on the one hand, the expanded and structured federal role in historic resource identification and, on the other, the local development of police power protection for historic districts and properties. It is a split which becomes important in a discussion of preservation planning attitudes.

The resource-based identification project of the federal government was one type of preservation planning if only because it met the simple criteria that it was pro-active. While it was an early and limited type and does not fulfill the relationship-based criteria for planning used in this thesis, it continues to influence the federal definition of preservation planning. But as both Hosmer and Murtagh observed, it was the alliances formed and the tools developed in Charleston that were to significantly change preservation and which form the basis for another type of preservation planning that has been practiced on the local level.

In Charleston was the beginning of an approach to preservation that equates it with other public welfare concerns and addresses our living neighborhoods as resources. The approach is closer to planning as it is practiced by city planners. Moreover, the coordination of historic preservation with the other local legislative and administrative concerns in Charleston laid the groundwork for preservation planning to be policy oriented and land use based, and anticipated by many years the focus on preservation by its professionals as a quality of life concern. Only as recently as the past decade, has the federal government incorporated this approach into its philosophy of preservation planning with regard to the state historic

preservation plan.

The next major watershed for preservation was the chartering by Congress in 1949 of the National Trust for Historic Preservation. The Trust was to be a private, non-profit group which would receive some government assistance. Congress envisioned the primary responsibility of the Trust to be the fostering of a national network of preservation concern. The Trust was to be a nationwide organization which could offer assistance on a local level. It was an organization to be made up of both public and private, vocational and avocational preservationists. The creation of the Trust was intended to strengthen local preservation groups and fledgling ordinances. The Trust's activities led it to be much more closely associated with local preservation efforts and thus, its development of an overall planning approach to its work was clearly influenced by the local experience.

In the early 1960s, the Trust was called upon by the United States Conference of Mayors to help assess and examine the needs of the nation's preservation program. Heavy losses of historic resources during the post-war years of urban renewal and interstate highway building provided the impetus for the Conference of Mayors to organize one of the first real planning groups for preservation. The study group's analysis and recommendations were published in 1963 as *With Heritage So Rich*. The preservation planning approach which the group advocated was expressed in the "Recommendations" chapter:

"Throughout this report the term historic preservation has been used to include the protection, rehabilitation, restoration and reconstruction of communities, areas, structures, sites, and objects having historic, architectural, social, or cultural significance.

To carry out the goals of historic preservation a

comprehensive national plan of action is imperative. Such a plan will encourage, improve and reinforce public and private leadership.”⁹

The recommendation for legislation, and other implementation techniques was what the study saw as a “plan.” In fact the book was itself a national preservation plan in that it analyzed data, came to conclusions and made recommendations for the future.

The “plan of action” proposed in *With Heritage So Rich* led directly to the next major turning point in preservation, the passage of the National Historic Preservation Act of 1966¹⁰. The Act was a conscious effort by Congress, to plan pro-actively for the nationwide preservation of historic resources. It expanded the National Register of Historic Places, and stipulated that each state must have a State Historic Preservation Officer and state program complete with a “state comprehensive historic preservation plan.” Policy-oriented preservation planning was introduced in the Act by way of the environmental consultation and review process laid out in Section 106.

While the Act detailed the criteria to be utilized in the system of survey and identification to be used for the National Register Program, it did not similarly define the “comprehensive state historic preservation plan.” That job was left to the National Park Service, as the federal agency charged with the Act’s implementation. The Act did, however, articulate a national historic preservation policy which gives a clue as to the expectations Congress had for the preservation program.

“It shall be the policy of the Federal Government ... to use measures, including financial and technical assistance, to foster conditions under which our modern society and our prehistoric and historic resources can exist in productive harmony and fulfill the social, economic, and other requirements of present and future

generations.”¹¹

Survey, identification, and registration were tools for planning but planning itself had to take into account these broader goals for preservation stated by Congress. Preservation needed to be integrated into the decisions we as a public make about our quality of life and the things we build and demolish. This attitude as did much of the language of the Act came from *With Heritage So Rich*.

By creating a major new governmental force to fulfill the goals of a national preservation program, the National Historic Preservation Act marks a second divergence in the development of preservation planning. The first was in the 1930s when the federal and the local preservation efforts began to diverge. The NHPA accelerated a separation between public and private efforts. The irony is that the team effort that generated *With Heritage So Rich* was one of the first high level preservation alliances. It was a coming together of preservationists - the National Trust for Historic Preservation - and politics - the United States Conference of Mayors and other legislators. The new program created by the Act celebrated partnership and a new federalism by integrating the local, state, and federal governments with private efforts. But the government's approach to preservation planning began to diverge from the sentiments that filled the text of the Act and that continued to be pursued by the private sector.

In the aftermath of the NHPA, the National Trust focused its attention on technical assistance, advocacy, and encouragement of local efforts, leaving the federal government to coordinate the resource identification project of the National Register of Historic Places and the review of federal undertakings. Thus through its connection to the pulse of local advocacy and

regulation, the Trust was able to develop alliance-building and negotiation techniques important to relationship-based preservation planning.

The Trust has not, in its many publications to date, actually described or articulated a particular philosophy of preservation planning. But at regular intervals it has published quasi-master plans for its own future actions. The attitudes of the organization as presented here, have been gleaned from these self-reflective, analytical publications, as well as from its activities.

After the passage of the NHPA, the National Trust for Historic Preservation concentrated both on assisting local governments and at national level policy issues. An example is the publication in 1972 of *Techniques for Incorporating Historic Preservation Objectives into the Highway Planning Process*, a report written for both the Trust and for the U.S. Department of Transportation.¹² The report demonstrated the potential for overlapping laws - Section 106 of the NHPA and Section 4F of the 1968 Department of Transportation Act¹³ - to open opportunities for integrating preservation into mainstream planning.

On the other hand, the National Park Service, undertaking the new and immense task given it by the National Historic Preservation Act, was initially absorbed in the survey and registration of resources and the personnel-type management of the newly created State Historic Preservation Offices. This early focus of the Park Service explains why their initial approach to planning was to make the National Register function and then to make it into a resource-based planning tool. It also explains why the National Register became a key element in their management of the states. However, the Park Service at this time also started to develop what was to become a key ingredient of the kind of planning contemplated in this thesis -

professionalism and a useful bureaucratic vocabulary that could interface with other government concerns. To be sure, there had been preservation professionals in the Park Service, at Williamsburg, and in a few major cities well before 1966. But the scale of the new government programs considerably accelerated the development of a professional corps of historians, architects, archaeologists, and others. As an outgrowth of this development, by the mid-1970s graduate programs in preservation began to appear offering an opportunity for preservation professionalism to mature. The preservation professionals of the 1960s and 1970s included very few planners, a situation that has not really changed to the present. This perhaps was a key reason why preservation planning has been so difficult for both the Park Service and the State Historic Preservation Offices.

The next significant date for preservation was 1976, when a major Tax Reform Act was passed¹⁴. The historic rehabilitation tax credit was added to the national preservation program which was substantially changed by it. The credit was a direct reduction of tax owed by 25% of the cost of rehabilitation. The buildings rehabilitated had to be on or eligible for the National Register and the work had to be certified by the State Historic Preservation Offices and the Park Service as historically appropriate. Suddenly, the preservation of historic buildings was not only economically competitive with new construction, but was actually profitable. Moreover, local governments now had an important new card to play in their defense against "takings" challenges because rehabilitation of designated historic properties offered a profitable way of complying with an ordinance's restrictions.

The ensuing wave of interest in nominating properties and districts to the National Register and in creating new local ordinances pushed

preservationists further towards alliance-building by introducing new and eager partners - developers and local politicians interested in economic development. The tax credit crystallized the image of preservation as an economic development tool, changing the way preservationists have marketed their efforts and breaking down many barriers to alliance-building.

1980 represents the next important watershed date with the passage of major Amendments to the National Historic Preservation Act¹⁵ and also as the beginning of the Reagan era which represented a prolonged funding crisis for the preservation program. The 1980 Amendments represented a redefinition of the national preservation program. Partnership was further emphasized by expanding the roles of local and state governments in the national preservation agenda. The Certified Local Government was initiated and the State Historic Preservation Offices were given more responsibilities. Furthermore, the importance of local and state significance for historic resources was articulated.

However, at the same time that the Amendments increased the responsibilities of the SHPOs, federal funding was reduced. There was a moratorium on "bricks and mortar projects" previously supported by federal grants. The focusing of the reduced resources on administration of the existing, required programs introduced a new intensity of bureaucracy. The National Park Service also increased its oversight of the state programs as a result of new directives from the Amendments. The emerging friction between the states and the National Park Service can be seen in the struggles over planning which intensified in the mid-1980s.

Early, pre-Amendment state historic preservation planning was based on the assumption that statewide surveys and registration was a completable

task. There was, in fact, a proposal in 1974 called "Project Protect" to appropriate enough money over ten years to actually "finish" the surveys, register, and plans but Congress turned it down¹⁶. However, when the reality of the situation became clear- namely that there was simply not enough money to bring the surveys and Register up to date, especially with the Reagan Administration funding cutbacks - a new approach had to be developed which attempted to create a preservation program that was not dependent upon "complete" resource information. Essentially a new preservation planning philosophy was needed which emphasized other aspects of the movement such as the ongoing dialog between preservationists and other planners. It was in this atmosphere that the Resource Protection Planning Process (RP3) was developed, which was to have a profound effect on preservation planning at the state level. It was originally intended to substitute a flexible planning framework - the historic context - for a completed survey. In 1983, the Secretary of the Interior's Standards for Historic Preservation were published which officially specified standards for preservation planning based on the RP3 model. The Standards represented, according to William Murtagh, a "chapter" in the unofficial American charter for preservation.¹⁷

The National Trust for Historic Preservation also expanded its programs at this time to include more alliance-building and economic development-oriented undertakings. Examples are the establishment of the National Main Street Center and the Rural Conservation Project.

The 1986 Tax Reform Act¹⁸ changed private sector involvement dramatically by reducing the usefulness and profitability of the rehabilitation tax credit. Thus, pressure was put on the newly emerging economic

development ties formed by preservationists. Some states moved to augment the reduced credit with the adoption of state tax incentives. Many states had similarly responded to the Section 106 review and the National Register with comparable state programs.¹⁹ The new state level laws and regulations gave these states a leadership role in their own preservation programs. These states became initiators not merely administrators of a federal program which affected their attitude towards the national preservation program and in particular towards the development of the state historic preservation plan.

In the mid-1980s struggles over the statewide comprehensive preservation plan reached a peak as the Park Service began to link the plans to the Historic Preservation Fund apportionment formula through their three-year program reviews of the state preservation offices. The friction was further intensified as state funding for the programs began to decline and the time required to comply with the review process, which now included the completion of an acceptable plan, increased. Especially in those states that had substantial state level programs to run, the interaction with the Park Service began to seem like a bureaucratic burden.

A further development of the mid-1980s was that growth management was quickly becoming the land-use planning trend of the decade in response to the surge of new construction and many preservationists began to see a new opportunity for alliance-building.²⁰ In addition the 20th anniversary of the National Historic Preservation Act in 1986 sparked the publication of several histories, assessments, and reflections of the movement including the two main sources used in this chapter, *An American Mosaic* and *Keeping Time*, both of which noted that preservation planning had been a major weakness in the movement. As Robert E. Stipe points out in

American Mosaic:

" ... for all the success enjoyed by the American preservation movement during the last two decades, there has been an utter failure to develop long-term, continuing strategies for the preservation movement as a whole and to recognize the importance of doing so. As Jerry Rogers, the Associate Director for Cultural Affairs of the National Park Service put it in 1986, 'When you're playing defense, you don't strategize very well.'"²¹

Here Stipe uses the term "strategy" but means essentially "planning."

In the private sector, the National Trust for Historic Preservation further expanded its programs to provide better technical assistance to its constituents. The Trust continued to be interested in alliances and in policy issues that could pro-actively work to improve the preservation atmosphere. Besides their periodic studies and reports such as the 1972 transportation report, this interest is exemplified by the formation of Preservation Action (a political preservation lobby), the Preservation Law Center, the Preservation Policy Center, and the publication of the professional journal *Preservation Forum*. Several of its Critical Issues Grants have been given to develop broad analyses of the preservation program and its direction. Its annual meetings reports, in particular those on anniversaries, are like *With Heritage So Rich* in fact planning studies: they describe and analyze the past and existing conditions and recommend improvement for the future. Whether or not the National Trust has been successful in its efforts to improve the preservation atmosphere is well outside the scope of this thesis, but the efforts themselves have shown that the National Trust leadership has been acting in a planning capacity for many years.

The underlying philosophy of preservation planning has diverged in

the past fifty years into both the alliance-building mode of the private and /or local sector, and the resource- based mode of the public federal and state level. The state historic preservation plan has become a possible bridge between these two divergent trends. It was created in the public sector and exists on a state level. It is subject to the requirements and thus the prevailing planning philosophy of the Park Service, which for many years was very resource-based but which now emphasizes alliance-building. The next chapter will follow this development in detail, focusing on the Park Service's attitudes toward planning and its relationship to the State Historic Preservation Offices.

¹ William Murtagh, *Keeping Time: The History and Theory of Preservation In America* (Pittstown, N.J.: The Main Street Press, 1988), 166.

² U.S. Conference of Mayors (Special Committee on Historic Preservation) and the National Trust for Historic Preservation, *With Heritage So Rich* (1966). Landmark Reprint Series (Washington DC: Preservation Press, 1983).

³ Walter Muir Whitehill, "The Right of Cities to be Beautiful," In *With Heritage So Rich*, 151.

⁴ The "Standards for Preservation Planning " are a part of the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation" [48 FR, No. 190, Part IV] & [36 CFR 61.4(b)(3)].

⁵ Murtagh, 77.

⁶ The following books were used for the historical development of the preservation movement: Robert E. Stipe and Antoinette J. Lee, eds., *The American Mosaic: Preserving a Nation's Heritage* (Washington D.C.: US/ICOMOS, 1987); William Murtagh, *Keeping Time: The History and Theory of Preservation In America* (Pittstown, N.J.: The Main Street Press, 1988); U.S. Conference of Mayors (Special Committee on Historic Preservation) and the National Trust for Historic Preservation, *With Heritage So Rich*, Landmark Reprint Series (Washington D.C.: Preservation Press, 1983); National Trust for Historic Preservation, *Preservation: Toward an Ethic for the 1980s* (Washington D.C.: Preservation Press, 1979); Elizabeth D. Mulloy, *The History of the National Trust for Historic Preservation : 1963 - 1973*, for the National Trust for Historic Preservation (Washington D.C.: Preservation Press, 1976); James A. Glass, *The Beginnings of a New National Historic Preservation Program, 1957 to 1969* (Nashville, Tenn.: American Association for State and Local History and Washington D.C.: The National Conference of State Historic Preservation Officers, 1990); Beth Sullebarger, ed., *Historic Preservation : Forging a Discipline* (New York: Preservation Alumni Inc., 1989); Charles B. Hosmer, Jr., "The Background of Preservation Decisions," *Historic preservation: National Issues*, Ed. by Anthony Garvan, 1982-1983 Lecture Series, Historic Preservation Program, University of Pennsylvania (Philadelphia: University of Pennsylvania , 1983).

⁷ Hosmer, lecture, 6.

⁸ Murtagh, 59.

⁹ *With Heritage So Rich* (1983), 194.

¹⁰ Public Law 89-665, October 15, 1966, "The National Historic Preservation Act," [80 STAT 915ff].

¹¹ NHPA, Section 2.1.

¹² Russell Wright for the National Trust for Historic Preservation and U.S. Department of Transportation, *Techniques for Incorporating Historic Preservation Objectives into the Highway Planning Process* (Washington D.C.: National Trust for Historic Preservation, 1972).

¹³ Section 4(f) of the "Department of Transportation Act," (1968), Public Law 89-670, [80 STAT 931].

¹⁴ Public Law 94-455, "Tax Reform Act of 1976," Title XXI: Sec. 2124 " Tax incentives to encourage the preservation of historic resources," [90 STAT 1916].

¹⁵ "Amendments to the National Historic Preservation Act," 1980, Public Law 96-515.

¹⁶ Secretary of the Interior Roger C.B. Morton proposed "Project Protection" in January of 1974. It included a request for \$400 million per year for ten years to be used on the surveys and registration. (information from: Barry Mackintosh, *The National Historic Preservation Act and the National Park Service*, for the U.S Department of the Interior, National Park Service, History Division (Washington D.C.: Government Printing Office, 1986), 64.)

¹⁷ Murtagh, 283.

¹⁸ Amended in 1986 by the "Tax Reform Act of 1986," Public Law 99-514 ,[100 STAT 2085], in particular: Title II, Subtitle "F," Section 251.

¹⁹ For a listing of states that have a State Register and a State Review Process, see: Margaret Davis, "State Systems for Designating Historic Properties and the Results of Designation," from the National Trust for Historic Preservation, Preservation Policy Research Series, Summer, 1987.

²⁰ William R. Klein, "Widening Influence of Growth Management Strategies on Historic Preservation," *Historic Preservation Forum* 4 (Summer 1990), 8-15 . Also see "Growth Management: A Boom for Historic Preservation," *Historic Preservation Forum*, 3 (September 1989),4-5; and "Growth Management Prominent Among 1990 Critical Issues Fund Grants," *Historic Preservation Forum* 4 (May 1990),3-5.

²¹ Stipe, *American Mosaic* , 291.

CHAPTER THREE

THE STATE HISTORIC PRESERVATION PLAN

Federal tax dollar accountability has generated the most thoughtful and specific attempts to define and analyze preservation planning to date. In order to answer to taxpayers and to defend its legislation from legal challenges, Congress has long relied upon the state comprehensive plan. The development of regulations, standards, criteria and guidelines for the national preservation program have always included a comprehensive state historic preservation plan. The plan was to be not only a justification of how the money was being spent but a way of insuring that a careful and systematic approach to preservation would be taken. The 1966 National Historic Preservation Act (NHPA) was one of the earliest laws to do so¹. In this Act, Congress included the statewide comprehensive historic preservation plan as the basic underpinning of federal grants to state programs. The criteria by which state preservation programs were determined to be fundable were more fully developed after the 1980 Amendments and are fleshed out in the National Park Service's regulations, "NPS-49."²

The need to justify and control the annual disbursements of the federal historic preservation fund to the states has, particularly since the early 1980's, created an elaborate system of scrutiny by which the Federal agency - the National Park Service - has reviewed the programs run by the State Historic Preservation Officers. For example, the disbursement of the Historic Preservation Fund, established by Congress in 1976³, is tied to the statewide comprehensive historic preservation plan. Not only must a state have a plan in order to receive the funding, but after the 1980 Amendments, its share is

determined by the needs and goals articulated in the plan. This has not only necessitated that each state take its plan seriously, but has generated, through the high level of scrutiny on the part of the Park Service, the only body of information attempting to explain and define historic preservation planning and to chart a future direction for it.

The Park Service has expressed its views of this process through many publications and conferences.⁴ However, the other side of the statewide planning issue - the views of the states - have largely been expressed through state reaction to the requirements of the Park Service and through the plans themselves.⁵ Analysis will need to start with the development over time of the Park Service's attitudes toward the state historic preservation plan and also of the relationship between the Park Service and the State Historic Preservation Offices (SHPO) which has shaped the planning documents themselves.

By 1966, the Park Service had been involved with individual historic resources for many years - quantifying, identifying, evaluating, and treating them. However, it had not been directly involved in historic preservation regulation of any kind. In the National Historic Preservation Act, it was the regulatory Section 106 that identified the real opportunities for preservation planning, in the sense of influencing others pro-actively. The Section 106 review and consultation provisions were to be administered by the newly created Advisory Council for Historic Preservation.⁶ The Council was also given other responsibilities that approximated planning activities, such as advising the President and Congress on preservation matters related to legislation, and studying the legislation, plans, and policies of other agencies in order to make recommendations for an improved preservation program.

However, it was the Park Service and not the Advisory Council for Historic Preservation which became responsible for making sure that the states accomplished the comprehensive preservation plans required under the National Historic Preservation Act. Even so, the primary preservation responsibility of the Park Service under the 1966 Act was to maintain and manage the National Register for Historic Places - so it is no wonder that its vision for planning was heavily resource-based.

Local governments had been managing strong regulations since the creation of the first historic preservation ordinance in Charleston in 1931. Local preservationists had had to quickly learn how to form alliances in order to become a part of local planning decisions. Resources were surveyed and identified as part of a larger, integrated process. Similarly, The Advisory Council on Historic Preservation was from its inception involved in alliance building and negotiations as a part of its Section 106 responsibilities. Yet neither local governments nor the Advisory Council were involved in the comprehensive planning efforts going on at the statewide level. As requirements of the federally subsidized State Historic Preservation Offices, the plans were solely overseen by the resource-focused National Park Service.

As part of the oversight process, the state comprehensive historic preservation plan has been the target and the centerpiece for certain struggles and friction between the Federal and the State levels of the preservation network. In the 1987 book, *The American Mosaic*, the chapter "State Programs" includes a brief history of comprehensive statewide preservation planning - the only such published history uncovered by this author. According to the author of the chapter, Georgia Deputy State Historic Preservation Officer Elizabeth Lyons, the Park Service has in the past focused

far more heavily on the other, more resource-based requirements such as the National Register Program, and has only in the last ten years devoted a great deal of attention to the planning requirement. She wrote:

“It is often overlooked that participation in the federal-state partnership envisioned by the Preservation Act of 1966 required the preparation, by each state, of a comprehensive, statewide historic preservation plan,.... The earliest plans, prepared quickly for the purpose of getting the program underway, were designated ‘preliminary only.’”⁷

As has already been mentioned, the very idea of a state comprehensive historic preservation plan was not articulated until 1966. The National Historic Preservation Act did not define the term “comprehensive historic preservation plan”, and so compliance, let alone consistency, was not to be expected until some sort of guidance was provided by the National Park Service. The state preservation programs mandated by the Act were not really up and running until 1970, by which time most states had established the required historic preservation office and federal funds were actually being disbursed.

In Lyons’ history, most of the plans of the early 1970s used a simple three volume format. The first volume was a summary of the state’s history including its preservation efforts. Volume I also attempted to describe intergovernmental relationships and preservation problems in the state. Volume II was an inventory of cultural resources in the state which, Lyons says, was to be expanded “according to the state’s own priorities and procedures, but subject to approval by the National Park Service.”⁸ Finally, Volume III was the “Preservation Plan” and included the status of the present preservation program and objectives for the future. These “plans” were

largely annual office operating plans.

According to Lyons: "By the mid-1970s, plan revisions and reviews became part of the annual grant application process by which federal funds were apportioned to states."⁹ The three-volume format proved to be problematic. A moratorium on this format was declared in 1974 at the request of the National Conference of State Historic Preservation Officers (NCSHPO) in order to come up with a better idea for planning.

With the collaboration of the NCSHPO, the Park Service conducted a special planning study and eventually published new planning criteria in 1977. Lyons wrote:

"Having much more flexibility, these criteria outlined state historic preservation responsibilities and directed states to develop new planning documents, again organized according to their own needs. No particular form was prescribed as long as the state provided a clear rationale for each program component, evaluations of its effectiveness and future program directions."¹⁰

Thus the plan was relaxed to minimally provide a rationale for funding, a self-assessment and ideas for the future. The nature of these requirements reflected the fact that they came out of the annual grant application review process.

During the Carter administration, in the late 1970s, the Heritage Conservation & Recreation Service, a newly created National Park Service preservation agency, advocated a system called 'management by objectives' and looked for greater accountability from state historic preservation programs. Lyons wrote:

"The annual program report itself then became the plan, a lengthy and complicated document entailing elaborate statements about objectives and performance measures. These plans had to be completed before the federal

government would approve funds for the state. States objected to this new approach and sought to separate the annual grant application process from comprehensive statewide preservation planning for state programs.”¹¹

The brewing conflict between the States and the federal government over the plan caused the Park Service to explore other planning possibilities. Lawrence Aten, then Chief of the Interagency Resources Division of the Heritage Conservation and Recreation Service, developed a model drawn from the archaeology and cultural resource management fields called the “Resource Protection Planning Process” which soon became known as “RP3”. Federal grants were awarded to several states to evaluate the feasibility of the model and workshops were held in 1979-1980 to further refine it.

RP3 was a conceptual model for a resource-based planning process which sought to facilitate decision-making. Its objectives, as stated in the 1980 publication by the Heritage Conservation and Recreation Service, *Resource Protection Planning Process*, were:

- “1. To make preservation decisionmaking a normal function or element of land use decisions rather than an exceptional one;
2. To reduce administrative conflicts concerning historic preservations decisions;
3. To decrease the need for Federal decisionmaking about historic preservation;
4. To decrease the frequency of Federal intervention in State and local historic preservation decisions;
5. To establish the practical basis for decentralization of preservation authority to the States;
6. To convert the Federal role in historic preservation to oversight, conflict resolution, and research and development;
7. To provide a focus for public participation in preservation decisionmaking.”¹²

Clearly, there were great hopes for preservation planning in 1980. The hopes

were not unreasonable, but the planning model eventually proved to be. Aten, an archaeologist had trouble accepting what many states started saying in response to the model - that the process did not make sense for above ground properties subject to "real world" constraints. It is further limited by its exclusive dependence upon a planning tool called the "historic context." The context was the main feature of the planning model from which all planning goals, priorities and decisions were to derive.

The historic contexts were a thematic and chronological approach to the State's history. They were predicated on the idea that "the cultural landscape was created by non-random processes."¹³ The context was meant to be both a framework of related property types within which to assess the significance of newly discovered resources and a way of predicting the extent and location of most of the associated property types. The difference between a context and a simple history was that the context focused on material culture (ie. the associated property types), and on already identified associated resources. A context had to include a time frame, a geographic focus, and a historical theme, ie: Early 19th century agricultural development in Southern New Jersey. Other important features of the contexts which made them into potentially powerful planning tools were: the assessment of current conditions and distributions of the known examples, threats to the remaining resources, and most importantly, goals and priorities for their preservation.

The RP3 methodology, as illustrated by the planning flow chart in **figure 1**, from the 1980 "RP3" publication, focused on the development of preservation goals, such as the need for more survey of an area or resource type, based on the historical information contained in the contexts. These goals were then to be reconciled with those of other contexts to provide

Resource Protection Planning Flow Chart

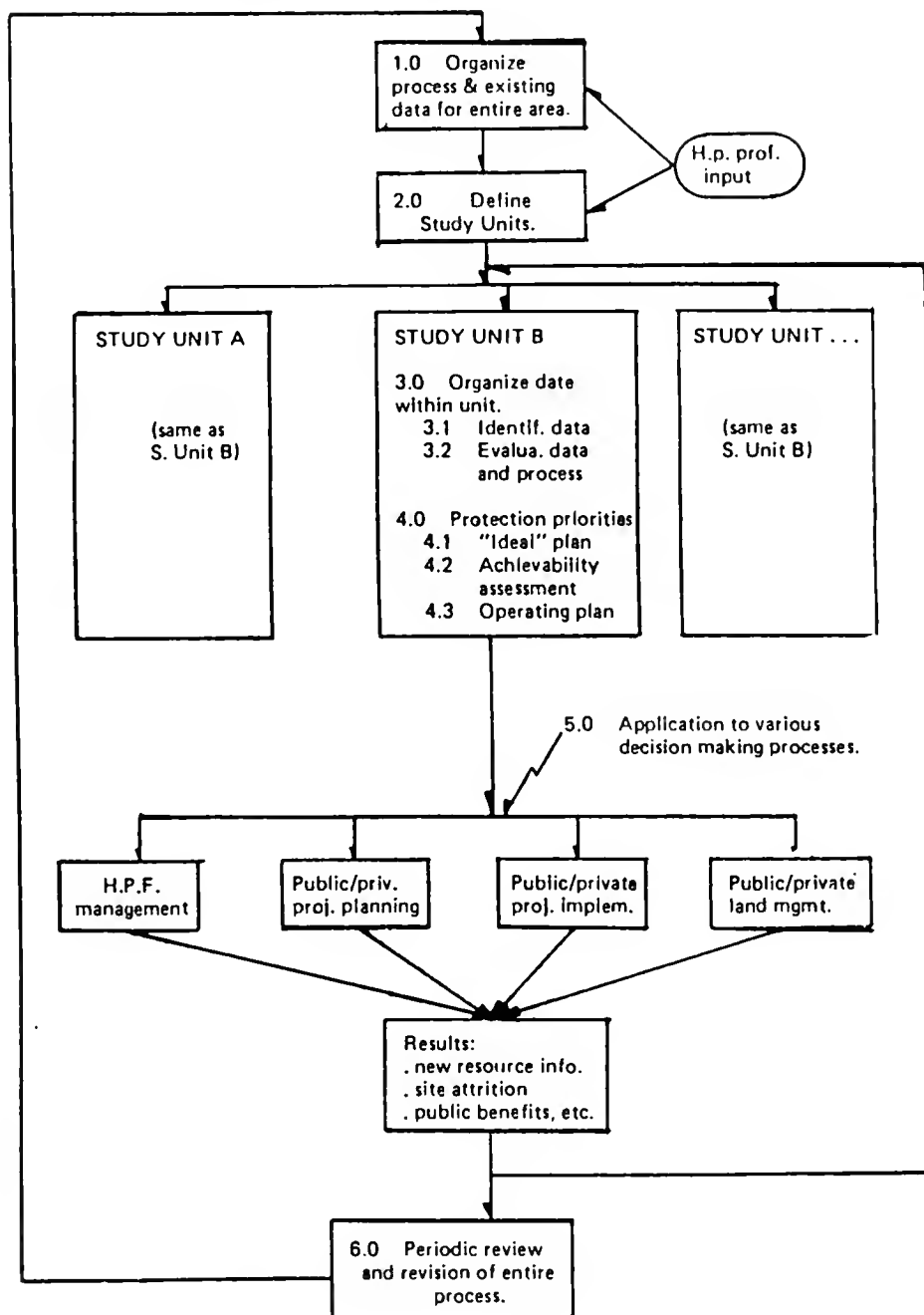


Figure 1. Preservation Planning Flow Chart - 1980

Source:

U.S. Department of the Interior, Heritage Conservation and Recreation Service, *The Resource Protection Planning Process* (Washington D.C.,1980).

overviews of ideal statewide preservation goals, which were finally tempered by situational considerations. The process was intended to turn information about the state's historic resources into a usable tool for both the State Historic Preservation Office and for land-use planners.

In 1983, the U.S. Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" were published and included Standards for Preservation Planning.¹⁴ Both the Secretary's Standards and the 1980 Amendments to the National Historic Preservation Act from which they originated had a significant impact on state-level preservation planning. From these documents came criteria and structure for many preservation planning decisions. The Secretary's Standards for Planning were based on the RP3 model, thus codifying what had been merely guidelines into the legal criteria for funding approval. In a sense, the technical assistance for planning that the Park Service had been giving to the states was translated, by the establishment of standards and regulations, into planning oversight. Although, according to a Park Service reviewer, until further review procedures and criteria were established several years later, the reviews continued to take the form of technical assistance - helping the states interpret and use the new standards.¹⁵ According to Lyons: "As a consequence, planning concepts and requirements increasingly became an issue between states and the National Park Service." ¹⁶

The Secretary's Standards for Planning were brief but sought, in the accompanying "guidelines," to explain and define officially for the first time how the states were to plan for preservation. The Standards are the following:

"Standard I. Preservation Planning Establishes
Historic Contexts.

Decisions about the identification, evaluation, registration, and treatment of historic properties is understood.... The development of historic contexts is the foundation for decisions about identification, evaluation, registration, and treatment of historic properties.

Standard II . Preservation Planning Uses Historic Contexts to Develop Goals and Priorities for the Identification , Evaluation , Registration , and Treatment of Historic Properties.

...The goals with assigned priorities established for each historic context are integrated to produce a comprehensive and consistent set of goals and priorities for all contexts in the geographical area of a planning effort.

Standard III . The Results of Preservation Planning Are Made Available for Integration into Broader Planning Processes.

Preservation of historic properties is one element of larger planning processes. ... [H]istoric preservation planning is most successfully integrated into project management planning at an early stage.”¹⁷

Lyons evaluated the states’ reception to the RP3-based planning requirements:

“...a few states actually began a planning process according to this model. Most states got no further than the study unit framework, although many developed specific study units and a few operating plans. Many states, however, found RP3 useful as a tool to organize resource data and as a means of involving a reluctant academic community in the evaluation of the state’s historic and archaeological information. Some state planners were reassured by the knowledge that historic and archaeological resources followed patterns of development that might help them in their project planning. To date, no state has been able to develop fully, the operating and management plans called for by the model. Most who used it have adapted it to better serve state program needs. ... State historic preservation offices that attempted a comprehensive preservation planning process, whether structured according to the RP3 model or a substitute, found the process useful.”¹⁸

In fact, according to SHPO staff members in Georgia and New Jersey and to Nancy Miller, current Deputy Director of the NCSHPO, there was quite a bit of resistance from several states which found the model confusing and in some cases quite flawed. More recently, in discussing historic contexts as the basis for a planning system, Robert Stipe wrote in *American Mosaic* :

“[Contexts] thus may help rationalize the evaluation process, but they do not address the central planning problems of influencing development decisions.”¹⁹

In response to the negative reactions, Lawrence Aten, head of the Interagency Resources Division of the Park Service, published a defense and explanation of RP3 in the December 1983 issue of *The Forum of the Society of Architectural Historians*. He emphasized that the contexts were an alternative to waiting until the state inventory was complete before attempting to plan, which he called the “accumulation” approach. He explained his reasoning:

“ The ‘accumulation’ strategy assumes that historic property data are unique and additive, and that effective planning cannot be undertaken until all or most of the potential data have been collected. Even if this were true, it obviously would be an impractical strategy because the desired information would not be available for decades, if then, while land use decisions are being made now...

The alternative approach emphasizes the use of information other than its accumulation. It capitalizes on the cultural relationships between historic properties, on the susceptibility of preservation planning to managerial techniques, and on the need to perform planning through a flexible, systemic process capable of self-correction through feedback.”²⁰

He further emphasized the importance of planning to the “public administration role” of preservation established by the 1966 National Historic

Preservation Act.

In the same issue of *Forum*, Patricia Weslowski, the Massachusetts State Historic Preservation Officer, responded to Aten with the views of the states and noted specific criticisms of the process. She wrote:

“From the perspectives of the various states, the National Park Service (NPS) planning model may be viewed as (1) an opportunity to establish an unambiguous, timely, and explicit decision-making framework and set of management priorities for the state preservation program, or (2) an unnecessary exercise in relabeling and reorganizing the results of past planning efforts in unfamiliar terms with a model that is inherently based in the social sciences, or (3) as a necessary but perhaps misdirected attempt to effect conflict avoidance through written ‘master planning.’ Undoubtedly there are other perspectives and most states likely hold a combination of these views.”²¹

Her criticisms included: a) the lack of guidance provided in resolving conflicts among contexts; b) the potential for the context system to become too detailed, elaborate and inefficient (similar to Aten’s criticism of the “accumulation” approach); and c) the incompatibility between the broad historical boundaries of the contexts and the present-day political boundaries in which the decision makers - the intended beneficiaries of the information - operate.

Some of her criticisms have in fact turned out to be true handicaps. In particular, the context development did become cumbersome and time-consuming to finish. Furthermore, according to Karen Easter, a planner in the Georgia SHPO since 1983 and member of the NCSHPO Planning Committee, the implementation of RP3 by the Regional Branches of the Park Service focused heavily on the contexts alone and de-emphasized the aspects of the model which she felt related to true planning - the consideration of the

planning environment of the state in developing goals.

There grew to be a gap between the broader-perspective planning literature coming out of the Washington Park Service office, such as Aten's explanation of RP3, and the program review and planning oversight taking place in the Regional Offices. The Regional Offices embraced RP3 and were leading the states through the maze of context development and were rejecting plans which did not comply with their narrow view of RP3 guidelines. In the opinion of Easter, a trained planner, "RP3 was a severely flawed system" in which priorities were to be developed solely on the basis of historical information and did not deal with how resources are affected by "all the forces that make up the real world."²² This view is not uncommon among State Historic Preservation Office staff members.

Aten, the author of RP3, is an archaeologist, as are many of the Regional Office program reviewers and some of the SHPO staff members who have prepared the contexts and plans. It became increasingly clear that, while the model worked well for archaeological resources, the problems of above ground resources (which exist in communities where they are regulated as a land use, and are subject to economic pressures), were not adequately addressed. This has been the opinion, not only of a planner (Easter), but also an archaeologist and federal program reviewer (Lloyd Chapman of the Mid-Atlantic Regional Office of the Park Service).²³ While both surveys and the subsequent historic contexts, are important pieces of the database on which to build strategies, they have been focused on far too heavily as the only pieces in the planning puzzle.

Starting approximately in 1984, enough states balked at RP3 and fought the model so that, primarily through the urging of the NCSHPO, the Park

Service eventually began to change the focus of its planning advocacy to embrace a more truly “comprehensive” approach. In 1987, deTeel Patterson Tiller, joined the Park Service’s Interagency Resources Branch as Chief of Planning. He was instrumental in fighting for the change in the attitude toward preservation planning. In a recent conversation with the author, Tiller remarked that when he first came to the Park Service he “empirically looked at all the nonsense that was going on out there [re:planning] and said: there is something not working here and I’m [going] to figure out what it is.”²⁴ Also important in effecting the shift was the staff of the Georgia SHPO which included trained planners who were interested in developing a more traditional land use planning approach to their own state preservation plan. Tiller, bolstered by the NCSHPO, nevertheless had to struggle a great deal against RP3 advocates, namely his superiors, the regional offices, and states that had already invested substantially in the RP3 process. By 1988, the Park Service had abandoned the name “RP3” in favor of “comprehensive planning.” Easter, who attended all the planning meetings with the NCSHPO and the Park Service, felt that it was not until 1991 that attitudes about preservation planning had really come around, and RP3 was fully rejected. The Regional Offices, which had been largely left out of a discussion that involved primarily the NCSHPO, some individual state offices and the Washington office of the Park Service, were strong advocates of RP3 and continued to espouse it while the planning support literature and workshops of the Washington Office were rejecting it.²⁵ Throughout the years of attempting to comply with the Standards, there were hardly any actual planners in the Park Service nor in the state historic preservation offices.

It is significant that the new planning philosophy and advocacy was to

come in part from the efforts of planners in Georgia to make sense of the Park Service's archaeologically-based planning model. Today there are still very few trained planners or even people with some planning experience involved in the preparation and review of the state historic preservation plans. However, in light of the prevailing philosophy of alliance-building with the planning profession, this may soon change.

The new Park Service focus for preservation planning is summarized by Tiller in his remark: "It is making preservation be a player at the land use planning table at the local, state, or national level."²⁶ Preservation planning was defined by the Park Service in a 1991 "Concept Paper" entitled "Historic Preservation Planning" as:

"... one of a number of different kinds of planning, differing only in subject matter (e.g, housing , transportation, environment, land use, etc.). The fact that historic and cultural resources occupy land area, that historic preservation IS a land use, makes it all the more imperative to plan for preservation in ways that are compatible and coordinated with the ways used to plan and regulate how land is used."²⁷

One clear shift was in the interpretation of the historic context. In RP3, the relationship between the comprehensive plan, the planning process and the development of historic contexts had proven particularly difficult to define and communicate to the states. This has caused a great deal of frustration both to the states and to the National Park Service. In 1988, the planning committee of the NCSHPO, in consultation with the Park Service, published recommendations for preservation planning which represented the beginning of the new interpretation. The summary, written by Paul Putz, South Dakota's Deputy State Historic Preservation Officer and Planning Committee chairman, highlighted and explained the misconceptions about

contexts which were causing problems. He wrote:

"Standard One of the Secretary of the Interior's Standards for Historic Preservation Planning states: 'PRESERVATION PLANNING ESTABLISHES HISTORIC CONTEXTS.' ... The significant point here is that the standard does not say all planning is based on those contexts. Standard One requires that historic contexts be part of the data used in historic preservation planning but recognizes that other data is needed as well...

The Secretary's Standards are explicit in terms of one element required of preservation plans: 'PRESERVATION PLANNING USES HISTORIC CONTEXTS TO DEVELOP GOALS AND PRIORITIES FOR THE IDENTIFICATION, EVALUATION, REGISTRATION AND TREATMENT OF HISTORIC PROPERTIES.' This language has been interpreted as meaning all goals, etc. are to be so linked. That is not the case. In addition, there is the impression that historic contexts were to be produced prior to all goal production. Again, that is not the case."²⁸

Putz was expressing an initial, cautious approach to the contexts. However, currently the attitude of the Park Service as voiced by Tiller is that "contexts are to comprehensive preservation planning what traffic counts are to municipal master planning." In other words, they are simply background data or planning tools. The 1991 "Concept Paper" mentioned above further articulated and updated the Park Service's interpretation of the context:

"Historic contexts have an essential role to play in the planning process as special planning studies whose results support conclusions, statements of conditions, issues, goals, etc. in the Plan; they are not the State Plan, nor the sum total of all planning activities."²⁹

The states that have invested a great deal of money and time in the preparation of elaborate contexts are now faced with the notion that planning requires much more than contexts and that the contexts do not even belong

in the planning document. Nancy Miller of the NCSHPO cites this situation as the source of a great deal of frustration for some states, even though the NCSHPO, their representative, has been involved in the explanation and interpretation of planning by the NPS.³⁰

Another important shift from the RP3 model, was in the interpretation of Standard III to mean “influencing the larger planning arena.” The 1991 “Concept Paper” made this clear:

“Planning Standard III is too limiting: ‘The Results of Preservation Planning Are Made Available for Integration Into Broader Planning Processes’ implies ‘turning the information over and walking away’ ; to be effective, preservation planning needs to encompass much more than this.

Who implements? Just because the SHPO doesn’t own or manage land / resources doesn’t mean it can’t have influence over the actions of others; these others help implement through actions they carry out.”³¹

Such a statement clearly illustrates that Tiller’s idea of “ getting a seat at the table” had become much more the focus of NPS guidance and requirement. This was to be accomplished through the “integration” mentioned in Standard III. The “Concept Paper” defined it as follows:

“ ‘Integration’ means the incorporation of resource and preservation values and goals into the policies, planning programs, and activities of others. The development and nurturing / maintenance of ongoing relationships with these others is essential to integration. Integration does not happen if preservation planning is done in isolation from other interests and if the plan is merely distributed to others without further interaction.”³²

The 1988 Planning Committee Report suggested that it was correcting misunderstandings rather than redefining. In other words, the Park Service

developed a new interpretation rather than a new rule, somewhat like the U.S. Supreme Court's ongoing interpretation of the U.S. Constitution. On the other hand, the 1991 Concept Paper on Historic Preservation Planning clearly criticizes and goes beyond Standard III. Nancy Miller feels that from the point of view of many states, the Park Service has in fact redefined planning in its recent interpretations - i.e. that it has essentially changed the rules without changing the Standards. From very recent conversations with Pat Tiller at the Washington Office and Lloyd Chapman at the Mid-Atlantic Regional Office, it seems that the Park Service denies that it has changed the definition of the comprehensive plan and insists that it is further clarifying a definition that may have been misunderstood. However, Chapman noted that the Secretary's Standards for Planning are currently under review and may be in fact be changed, which would support the strong statements made in the 1991 Concept Paper.

This seeming paradox can be further seen by looking at Chapter 30 of "NPS-49," the guidelines which the Regional Offices used to review the SHPO programs.³³ In 1986, the section on comprehensive planning in Chapter 30 stated as its "Minimum Approval Criteria: The State prepares and implements a comprehensive Statewide historic preservation plan that organizes preservation activities into a logical, interrelated sequence so that effective management decisions and recommendations can be made." The accompanying checklist for requirements listed items that were very much within the framework of RP3 and the Standards.³⁴ However, a 1988 addition, Chapter 31, adds certain key elements that reflect the new attitude of the Park Service. The interpretation of Standard III is stretched to require "substantive progress in ensuring that the results of the planning process are used in an

arena broader than the operations of the State office.."35 Chapter 31 additionally requires an "effective commitment to influence...the primary agents (both public and private) that affect historic resources..."

The change in the Park Service's attitude and emphasis can graphically be seen by comparing the 1980 RP3 planning flow chart (**figure 1**) to two more recent versions: a diagram from the 1988 NCSHPO Planning Committee Report (**figure 2**) and a new flow chart illustrating the 1991 Concept Paper (**figure 3**). All three illustrate processes that are ostensibly based on the same Secretary's Standards. The RP3 chart features the contexts prominently in a hierarchy which does not clearly include non-resource based data considerations. While the later flow charts describe a process in which an equal and simultaneous emphasis is placed on "existing situations" or non-resource based data and on contexts or resource based data.

The emphasis on contexts reflected by the Secretary's Standards - two out of three - is out of balance with the current view of them as a "special planning study", an organizational model and no more. Most of the current emphasis is on standard III and broader interpretation of Standard II. Standard III leads to the idea of "getting a seat at the table." It seems clear that the present vision for preservation planning has gone quite beyond the Standards. They have been the cause of nearly a decade of confusion and misunderstanding over planning. Perhaps contexts should not even be specifically mentioned - after all, there is no mention of other equally important data management and input systems.

The lack of clear and helpful communication to the states about the larger aims of "getting a seat at the table," especially in view of the resistance from the Regional Offices, means that their achievement will take some time.

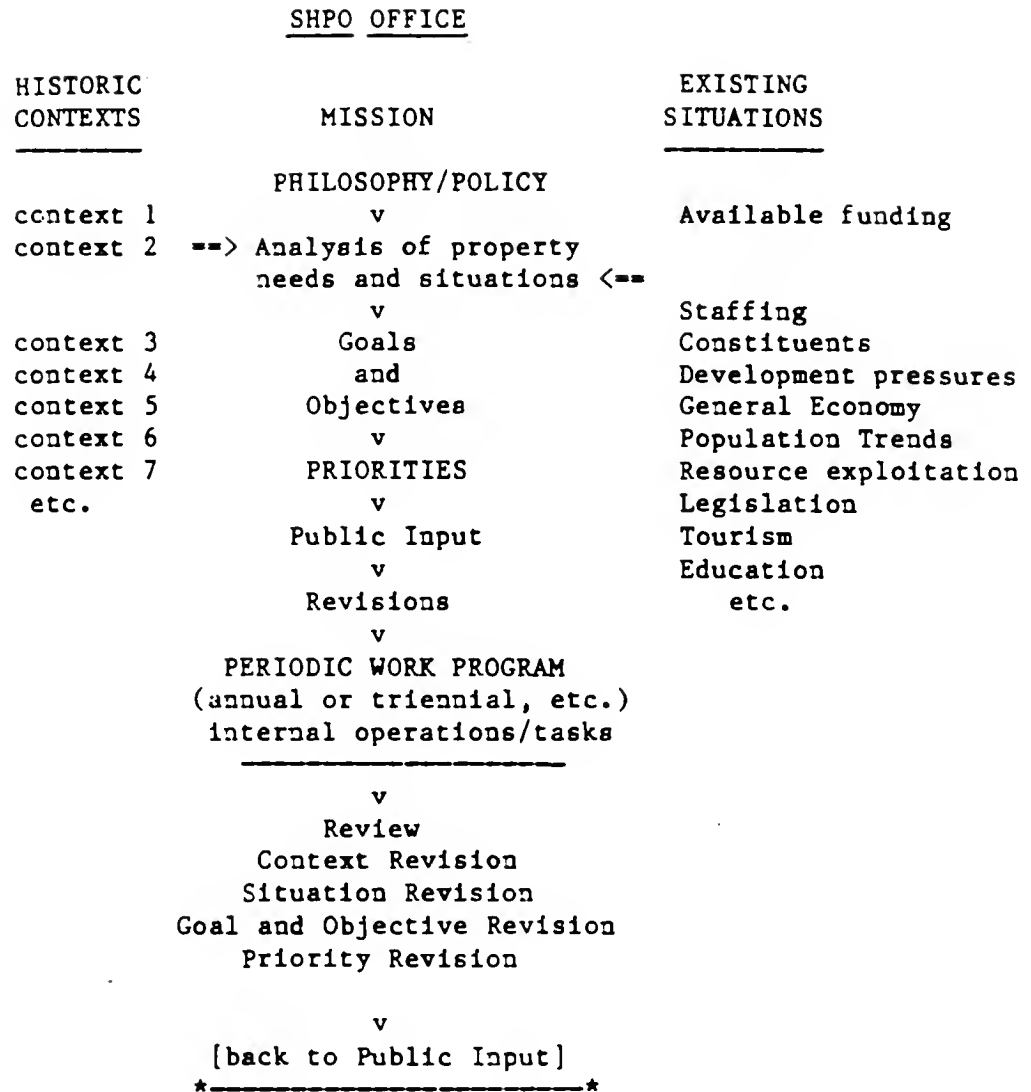


Figure 2. Preservation Planning Flow Chart - 1988

Source:

U.S. Department of the Interior, National Park Service, Interagency Resources Division, Preservation Planning Branch, "Historic Preservation Planning Process, a 'Concept Paper'" (Washington D.C., March 1991).

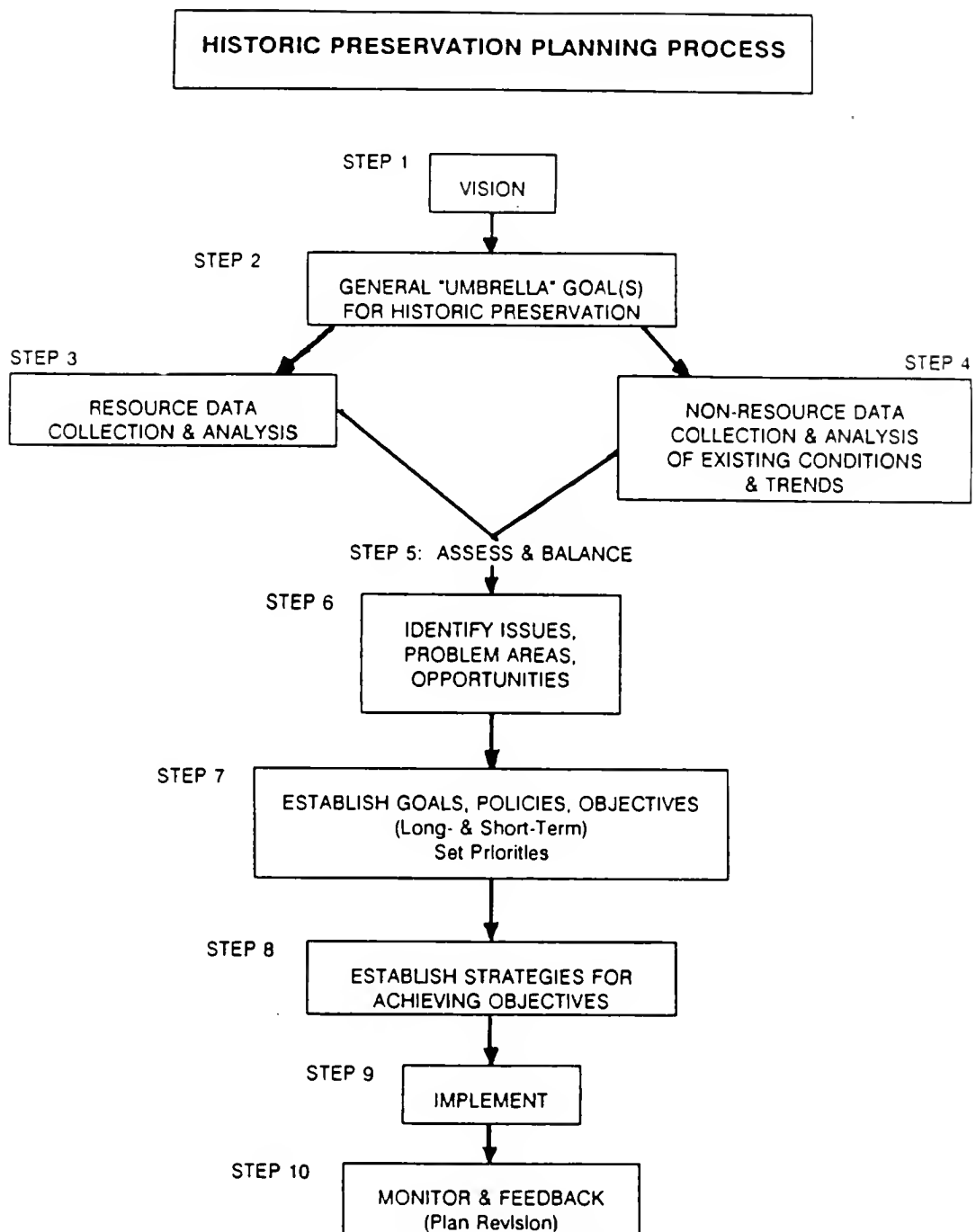


Figure 3. Preservation Planning Flow Chart - 1991

Source:

Paul Putz, "Historic Preservation Planning: A Guide for State Preservation Programs," (Summary Report of the NCSHPO Planning Committee Meeting, March 23-25, 1988, Washington, DC), *Compendium* 20 (December 1988), a publication of the National Park Service, Interagency Resources Division.

Tiller has said that he expects this to be a long process, possibly taking ten years. This prediction is consistent with a comparative history of urban or comprehensive planning. At the present, the modified directions are still fairly new and somewhat difficult for states with too little funding and planning expertise to accept, as many of them will have to re-think and even possible re-do their plans. In recognition of this, the Park Service, with encouragement from the NCSHPO, has attempted to be more flexible and understanding of the position states are in.

As early as the late 1960s, there was the notion that states should tailor any planning model to their own needs and essentially determine the criteria by which they are judged by the Park Service. However, by the late eighties, federal oversight and rigid standards were considered burdensome by many states which feared that they might dampen a state's individual planning style. The Park Service now wants to re-emphasize a more flexible approach - to allow states more freedom to set their own goals and criteria. The Park Service emphasized the flexibility and partnership qualities that it has been trying to recapture in its relationship with the states in the most recent program review guidelines. For example, the current version of Chapter 30 states:

"Review Teams must recognize that there will be a wide diversity of planning processes in the States depending largely on the specific State government mandates under which the State Historic Preservation Office operates, the relative levels of funding and staff size, and the State office commitment to the planning process. Planning processes evolve in response to the specific needs and circumstances present in each State. Diversity is not only to be expected but is desirable." ³⁶

There is a strong flavor of federalism here, and the mark of the

collaboration between the National Park Service and the NCSHPO in developing the planning program. Karen Easter, a member of the NCSHPO Planning Committee, reported that at a recent NCSHPO Planning Committee meeting, the Park Service actually suggested that all states should change their plans to conform to the new planning ideas using Georgia's plan as a new model. But there was significant alarm by states that already had approved plans in place so a compromise was reached. Every state has to have a plan - on their own time, and in their own format but, within the next few years they must address how historic resources are affected by various external forces.

According to Tiller, the current approach toward the state plans is that each state through its plan will essentially set the criteria for its reviews.

"What we intend to do with these preservation plans is to turn to the states and say: Given very broad guidelines, (ie. state historic preservation plans should cover all the resources in the State, should achieve a consensus among those it affects, etc.) you define your preservation planning process. You tell us what you want it to look like, what the elements are, what your cycle is, what your public consultation is, etc. You tell us what you want it to be, and then we will review you and provide oversight against your own standards, not against a textbook set of federal standards.

So when our regional offices or our office is reviewing a state plan, we don't have a standard book, we pull out the one for Florida and say: OK, let's see how you do with what you said you were going to do and what your priorities are and how you want to organize and how you want to deal with it."³⁷

The considerable friction that had been growing between the states and their federal overseers about RP3 and planning in general led Tiller to try to better understand the state's position. The alliance with the NCSHPO

Planning Committee was a part of this effort and was a mutual attempt by both the federal and the state agencies to develop a more effective approach to preservation planning.

However, despite the many planning workshops and concept papers about planning to come out of this alliance, many SHPO staff members have had difficulty accepting and recognizing some of the developments. This has been partly (or largely, depending upon the source) due to the often contradictory messages coming from the Regional Offices which concentrated more specifically on the Standards rather on their evolving interpretation. For example, a recent conversation³⁸ between the author and a state preservation plan author in the Florida SHPO revealed that he was not aware of the current "traffic count" interpretation of contexts and of the move to let states define their own criteria. He was dismayed by the first, because Florida's planning process has invested heavily in the completion of thirty historic contexts, but was encouraged by the second, because he felt that the state offices had a great many constraints and responsibilities that the Federal reviewers simply did not understand.

The Park Service has recently conducted a survey of the SHPOs on their planning processes to try to ascertain general trends and attitudes, such as that expressed by the Florida planner. A summary of the results was published in the fall of 1991.³⁹ The survey results identified some of the positive and negative aspects of SHPO planning efforts and further revealed the continuing need for even more training and assistance from the Park Service. This need underscores the severe limitations placed upon the SHPOs by the fiscal realities of today's state and federal funding levels, and perhaps some of the difficulties with the Regional Offices. The survey results also

reinforced the potential importance of a "Planning Institute" proposal made in 1990 by the Park Service. The American Planning Association in partnership with the Park Service would create a preservation planning curriculum based on standard planning principals geared toward the professionals in the State Historic Preservation Offices. The idea expresses a conviction on the part of Park Service that the SHPO staffs are very well qualified as the preservation experts of a state and are the appropriate authors of the state preservation plan. However, as the survey results showed, there is a lack of planning experience amongst those preparing the State plans. The "Institute" would possibly offer a certificate in preservation planning to those already in the field.

¹ According to Lawrence E. Aten, "Forum on Historic Preservation Planning: The Resource Protection Planning Process," *The Forum : Bulletin of the Committee on Preservation, Society for Architectural Historians* V (December 1983), 1.

² National Park Service, "National Register Programs Guideline: NPS-49, Review Procedures," These regulations and procedures are continually updated. The first version was released by the Park Service in 1984 after the publication of the U.S. Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation ." Sections were revised and added with each programmatic review of the SHPOs. The most current version dates from 1989, although a new round of reviews will be starting in 1993 so the document will be updated again.

³ Public Law 94-422, Sept. 28, 1976, Title II, "National Historic Preservation Fund," [909 STAT 1319].

⁴ Starting with the publication in 1980 of "The Resource Protection Planning Process," a preservation planning model for states to use, the Park Service has issued literature explaining the model, the 1983 Secretary's Standards for Preservation Planning, and subsequent Park Service interpretations of planning. The literature, such as a "Planning Questions" series, and the periodic workshops it has sponsored to help states develop their comprehensive plans are discussed later in this chapter. The planning process has required a great deal of technical assistance from the Park Service to the SHPOs because the models were complicated, the interpretation changed, and also because there was very little planning expertise among the SHPO staff members.

⁵ Aside from a few articles written by SHPOs (such as Patricia L. Weslowski, Response to Lawrence Aten, *The Forum : Bulletin of the Committee on Preservation, Society for Architectural Historians* V (December 1983), 2.; and Elizabeth Lyon's article in *American Mosaic* , "States: Preservation in the Middle," 81 -112), the main source for states' response to the planning process has been voiced through the Planning Committee of the National Conference of State Historic Preservation Officers. Many of the Park Service's publications on preservation planning in the last three years has included the input of this committee. The primary source for the states' reaction is, of course, the planning documents themselves. Two of these will be examined as case studies in Chapter Five.

⁶ The Advisory Council for Historic Preservation, which was created in 1966 by the Act to administer the Section 106 review process and to be a watchdog for preservation concerns within the federal government was an important alliance of preservationists and the leaders of many key federal agencies. The Council began to develop negotiating techniques that would become very important for alliance-building.

The NHPA stipulated that the membership of the Advisory Council should include the Secretary of the Interior, Secretary of Housing and Urban Development, Secretary of Commerce, Secretary of the Treasury, the U.S. Attorney General, Administrator of the General Services Administration, and later with subsequent amendments, the Secretary of Agriculture, Secretary of Transportation, Secretary of the Smithsonian Institution, and the Architect of the Capitol.

⁷ Lyons in *American Mosaic* , 105.

⁸ Lyons in *American Mosaic* , 105.

⁹ Lyons in *American Mosaic* , 105.

¹⁰ Lyons in *American Mosaic* , 105.

¹¹ Lyons in *American Mosaic* , 105

¹² U.S. Department of the Interior, Heritage Conservation and Recreation Service, *The Resource Protection Planning Process* (Washington D.C., 1980), 1

¹³ *Resource Protection Planning Process* , 2.

¹⁴ U.S. Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" [48 FR, No. 190, Part IV] & [36 CFR 61.4(b)(3)].

¹⁵ Phyllis Ellin, historian, and Lloyd Chapman, Chief of the Cultural Resource Planning Branch, both of the Mid-Atlantic Regional Office, National Park Service, March 11, 1992 Interview with author, Philadelphia, PA,.

¹⁶ Lyons in *American Mosaic*, 106.

¹⁷ Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" [48 FR, No. 190, Part IV] & [36 CFR 61.4(b)(3)].

¹⁸ Lyons in *American Mosaic*, 106.

¹⁹ Stipe in *American Mosaic*, 261.

²⁰ Aten, 1.

²¹ Patricia L. Weslowski, "Response to Aten," *The Forum: Bulletin of the Committee on Preservation, Society for Architectural Historians* V (December 1983), 2.

²² Karen Easter, Comprehensive Planner, Georgia Historic Preservation Section (the State Historic Preservation Office), April 10, 1992, Telephone interview with author.

²³ Ellin and Chapman, interview.

²⁴ Tiller, interview.

²⁵ In 1987, the National Park Service, newly joined by Tiller, started to focus more emphatically on planning in its technical assistance to the states. It started publishing a series called "Compendia" which addressed a number of programmatic issues and included a quarterly planning issue. The articles and information in the Compendia sought to de-mystify the comprehensive planning process and to clarify what the Park Service's interpretation of the Standards was.

"Compendium" was designed to be an "information exchange / newsletter" (Compendium, #1,p.1) for preservation professionals in state and federal offices. It absorbed an earlier series called "Planning Update" and took on the role of deciphering the federal planning requirements for the states as well as providing a forum for states to exchange planning information. One of these exchanges was a "Context Swap" which enabled SHPO staff people to see the efforts of their colleagues in developing historic contexts. The federal requirements were explained by means of a technical assistance efforts called "Planning Questions." The questions and answers were developed in consultation with the NCSHPO and it was primarily through this format that the interpretations being jointly developed were explained to the SHPOs. The other format for these explanations was the previously mentioned NPS-49 document which targeted the federal reviewers specifically. The first issue included the first seven Planning Questions, all of which related to historic contexts. As the years went on, the questions related more and more to other aspects of the planning process which were being more actively promoted.

Another form of technical assistance from the National Park Service again in collaboration with the NCSHPO, was a series of workshops and conferences about preservation planning. The first of these, a "Planning Basics Seminar" was held in May of 1988. The agenda included many case-studies of planning elements in action and examples of how historic contexts relate to other planning processes. In 1989, a workshop was held which addressed "Linking Planning with Survey, Evaluation, and Registration." The second seminar, building upon the first, was held in the spring of 1991 and a third is planned for the summer of 1992.

²⁶ Tiller, interview.

²⁷ National Park Service, Interagency Resources Division, Preservation Planning Branch, "Historic Preservation Planning Process," a "Concept Paper" publication, (Washington DC: U.S. Dept. of the Interior, March 1991),1.

This "Concept Paper" was an outgrowth of a special planning study entitled, "NPS Action Agenda for the 1990s: Historic Preservation Planning in National Register Programs" which came out in the fall of 1990. The planning study was important because it introduced the alliance being formed with the American Planning Association in the Park Service's technical planning outreach. It proposed a collaboration with the American Planning Association in developing training and techniques for the SHPOs and the idea of creating a "planning institute" with help from the APA for ongoing and high-level assistance. The institute addressed the problem of a lack professional training and proficiency for planning tasks on the SHPO staffs. The plan envisions a possible certification program which preservation professionals could take in planning.

²⁸ Paul Putz, "Historic Preservation Planning: A Guide for State Preservation Programs," (Summary Report of the NCSHPO Planning Committee Meeting, March 23-25, 1988, Washington, DC), as printed in *Compendium*, a publication of the National Park Service, Interagency Resources Division, Number 20, December 1988.

²⁹ National Park Service, 1991, "Historic Preservation Planning Process," 11.

³⁰ Nancy Miller, Deputy Director, NCSHPO, telephone interview with the author, September 16, 1991.

³¹ National Park Service, 1991, "Historic Preservation Planning Process," 7.

³² National Park Service, 1991, "Historic Preservation Planning Process," 9.

³³ Periodic state program reviews were started with a first round in 1983 to renew the approved status of the SHPOs which was to expire in December of 1983 according to the 1980 amendments. Regulations (36 CFR 61) and the Secretary's Standards had been published to guide these reviews but many chapters on the procedures and criteria for aspects of the reviews were yet to be written, planning among them. According to Phyllis Ellin, a program reviewer in the Mid-Atlantic Branch Office, the Round One reviews were "sketchy" and in terms of planning merely attempted to apply the newly written planning Standards -again, really much more of a technical assistance than a critical review.

When Round Two started in the fall of 1985, Chapter 30 of the review procedures (NPS-49) had been written including a section devoted to "Comprehensive Planning." Partly, the planning requirement checklist in Chapter 30 was based upon the responses to a planning assessment questionnaire sent out to the SHPOs in 1984 which requested a narrative describing the planning activities of the SHPO to date. NPS-49, the approved program requirements document, was and is a living document in that it was never published in a book form but rather in binder format. It is continually updated and expanded as the program is developed, refined, and as policies change. By the time Round Three was started in early 1989, Chapter 30 had been revised in accordance with evolving planning policy and a new Chapter 31, had been added to further elucidate the review procedures. Round Three has just been completed and planning meetings are starting to discuss Round Four.

Between Rounds Two and Three, Pat Tiller became chief of preservation planning at the Interagency Resources Division, and had put a great deal of effort into improving the relationship between the federal and state offices, technical assistance in planning, the general quality of the state comprehensive plans and the review process. He emphasized helping the states understand and use the planning ideas of the National Park Service.

³⁴ The checklist that follows includes four categories of “verification” that the reviewer must find. These are the following:

1. [NPS-49(30)(III-27)] The State has a current and accurate written description of its comprehensive historic preservation planning process which includes, at a minimum...(five items- planning philosophy, in-house planning process, list of historic contexts, public participation procedures, and review procedures.)
2. [NPS-49(30)(III-28)] The State establishes clear areas of operational responsibility and authority to implement the comprehensive historic preservation planning process.
3. [NPS-49(30)(III-29)] The State has developed historic contexts to a degree sufficient to produce goals and priorities for the identification, evaluation, registration, documentation and/or treatment of specific resources or resource types defined in the contexts (Secretary’s Standard II).
4. [NPS-49(30)(III-30)] The State has developed a process or strategy whereby goals and priorities derived from historic contexts are made available for use by other planning processes and programs in the State. (Secretary’s Standard III)” (U.S. Dept. of the Interior, National Park Service, “National Register Programs Guideline: NPS-49, Review Procedures.” 1983ff.

³⁵ U.S. Dept. of the Interior, National Park Service, “National Register Programs Guideline: NPS-49, Review Procedures.” 1983ff.

³⁶ National Park Service, NPS-49.30, 58.

³⁷ Tiller interview.

³⁸ James Miller, Archaeologist, Bureau of Archaeology, Florida Department of State, telephone interview with author, March 10, 1992.

³⁹ Preservation Planning Branch, Interagency Resources Division, National Park Service, “An Assessment of the State of the Nation in Historic Preservation Planning: A View from the SHPOs in 1990, Summary of Responses.” June 1991.

CHAPTER FOUR

PRESERVATION AND COMPREHENSIVE PLANNING

In 1966, preservationists secured the expansion of the National Register of Historic Places to include sites and, importantly, districts of state and local significance. Their effort was born out of the recognition that historic preservation was more than the saving of national landmarks. Rather, it was a quality of life issue that spoke to the experience of place everywhere. This recognition and the tools developed to address it led preservationists into the field of land use planning. Certainly at the local level, historic preservation ordinances have long forced a dialog and often some kind of alliance between preservationists and city planners.

But without the regulation of private property, which serves to catalyze the relationship to planners on the local level, historic preservationists working at the state or federal level have been much slower to act as if they were in the land use management business. The methods of City and Regional Planning at the heart of land use management seem foreign to historic preservation, as the development of state historic preservation plans over the past twenty five years, and in particular the Resource Protection Planning Process known as "RP3" that guided them, clearly reveal. The gulf between the City Planning and the Historic Preservation approaches to land use planning has not yet been bridged successfully on a consistent or broad enough basis. A 1984 article in the American Planning Association Journal by Eugenie Ladner Birch and Douglass Roby offered a history of the connections between the planning profession and preservation. The article entitled "The

Planner and the Preservationist: An Uneasy Alliance" stated:

"Historically, the planning and preservation movements have pursued distinct goals, served different populations, and experienced dissimilar patterns of organizational growth. In recent years, however, the two groups have moved closer together. Their growing cooperation has hinged on two interrelated items: each movement's evolving definition of its function in American society, and the changing nature of public-sector involvement in urban development."¹

Despite Birch and Roby's optimism about preservation's ever increasing alliances with planners, problems they identified lasted long after the article was published. They wrote:

"With the advent of the Reagan administration and its limited vision of urban assistance, the alliance threatened to crumble. When funds became scarce the two groups devoted their time and energy to survival, not alliance-building."²

There is still a very great gap of understanding between the two fields. The gap, however, is primarily one of methodology and terminology, because as Birch and Roby pointed out, the goal of enhancing the quality of life in our communities is a common thread to both.

On the other hand, the significance of a methodology gap should not be discounted. The difference between a powerful planning tool and a dusty volume on a shelf is often in what kind of data is included, how it is used, and how "user-friendly" is the document. A terminology gap can contribute to making a plan "user-unfriendly" if decision-makers and other planners cannot see how the preservation plan could interface with their own plans. Thus the statewide historic preservation plan could be a valuable vehicle for bridging this gap.

In order to achieve this, preservationists need to define planning in a

way that is compatible with comprehensive plans on all levels. The most important aspect to planning as it is practiced in land use management is that it makes choices, something that is notably weak or absent from most preservation plans. Many working preservationists come from a history, architectural history or archaeology background which are fields that place a high value on data but do not often have to choose between different pieces of evidence. All data that contributes to the knowledge of a subject's history is considered equally worthy of preservation. Similarly, preservationists have been loathe to discount the value of any historic resource in favor of another. deTeel Patterson Tiller put it this way:

" Management tends to be something that historic preservationists shy away from and in some instances we shy away from it with great pride. [A comparable attitude to] : we don't do floors and windows, [is]: we don't deal with treatment and management. We just tell you what it is significant and why and do the more arcane research. We don't get our hands dirty in making decisions and dealing with the people who affect these things."³

By contrast, land-use planning is essentially all about balancing values and making choices. The most important balancing in land-use planning is between the intrinsic value of something, such as a park, a water table, or an historic building, and the "market" in which it exists. The term "market" here includes economic, political and social factors, competing demands, and governmental limitations in addition to monetary value.

Historic preservation planning, despite one-line references to the contrary found in the Secretary of the Interior's Standards and other guidelines, had left out this critical "market" force in its data collection and especially in its development of goals and priorities. There was a clear de-

emphasis of this element in the RP3 planning process which advocated the historic context alone as the basis for priorities and goals. Thus RP3 led to unrealistic and, ultimately, unusable plans. Some of the RP3 - styled plans, such as Connecticut's, included brief, rather unspecific sections on the non-resource based existing trends but did not really figure them into the plan's goals or implementation.

The planning process has several steps : the collection and analysis of data; the identification of needs, goals and priorities; the development of implementation procedures and schedules for realization; and the periodic review. The state historic preservation planning process needs to take the development of priorities seriously and balance a multiplicity of interests and disciplines in its strategy-making.

State historic preservation plans are now called "comprehensive." It is important to establish a definition of the term "comprehensive" because it can mean, as it typically does on the local level, the coordination of all planning concerns in a given geographic area - ie. Goodtown or Blue County Comprehensive Plan. However, it can also refer to the coordination of all levels and geographic areas within in a single field of concern - the Comprehensive Historic Preservation or Transportation Plan.

A confusion of the different types of "comprehensive" plan is sometimes at the heart of the vast range and inconsistency of state historic preservation planning. Ideally "comprehensive" at the statewide level will refer to a synthesis of both definitions. The historic preservation plan should address its relationship to other fields and land-use planning concerns and involve the constituents of those concerns in the planning process. It might be developed as though it were a chapter or element of a statewide

comprehensive or growth management plan. On the other hand, it will primarily address historic preservation and the multiplicity of levels and forms of the preservation network in the state and involve those constituents in the planning process. In other words, it can and should be focused on the statewide preservation program, but by also becoming an alliance-building tool, it is more truly "comprehensive."

To evaluate the "comprehensiveness" of preservation planning, it is necessary to understand the mainstream planning context of the term. In the seminal textbook, *The Practice of State and Regional Planning*, planning scholar Bruce McDowell emphasized that planning is exceedingly "situational" in its requirements.⁴ He does not endorse a particular "right way" to plan. The flexibility he advocated is a part of the National Park Service's current attitude toward the state comprehensive historic preservation plan. In fact, McDowell, as a representative of the American Planning Association, was a speaker at one of the Planning Seminars given by the National Park Service for the SHPOs.

McDowell distinguished between "comprehensive," "functional," and "project" plans. By his definition, "comprehensive" plans are those that "...cover whole policy areas very broadly or seek to interrelate various different policies," while "functional" plans refer to a "more restricted policy field" and "... address only a single function of government - such as transportation."⁵

Local municipal planning is very much rooted in design because it deals with concretes such as building things, laying out things, etc.. It is largely "project" planning. However, state and regional planning is more administrative and less physical because states or regions do not, traditionally,

physically control things but rather have policies and regulations which add to local controls. Rarely does the state or regional government build (roads are probably the major exception to this) but increasingly, they help to build. There is a similar dichotomy in historic preservation - it is on the local level that actual buildings get saved, re-used, demolished, and there, planning is often physical and project oriented. However, on the state level it is expected that preservation planning will have a strong administrative and "functional" element, because states manage programs and regulatory procedures more than they are involved with individual resources.

An earlier definition may be found in The Journal of the American Planning Association (JAPA) which publishes articles attempting to define and analyze planning theory. In 1959, JAPA (then called the Journal of the American Institute of Planners) published an article by Melville Branch, entitled "Comprehensive Planning: A New Field of Study,"⁶ in which he distinguished the three planning types as: "physical" (the equivalent of McDowell's "project" plan), "functional," and "comprehensive." Branch wrote:

"Physical planning is concerned with the characteristics and arrangement of three-dimensional features on the land. Functional planning focuses on a particular aspect of the total problem. Comprehensive planning is the continued establishment of objectives for an institutional or organizational entity as a whole and the direction of its affairs so as to maximize the attainment of these goals."⁷

By these definitions, examples of state historic preservation planning can be found in all three categories. They are not necessarily all "comprehensive" . For example, Connecticut's historic preservation plan refers to the treatment of specific resources and thus includes features of a

“physical” plan. Furthermore, most of the plans focus solely on historic preservation which is a particular aspect of the whole “quality of life” problem and thus are essentially “functional” plans. Finally, the focus of most statewide preservation plans is to establish objectives for the “organizational entity,” or the State Historic Preservation Office, and thus are “comprehensive” in that sense. However, it seems that the term “functional,” as both Branch and McDowell have defined it, best describes what most states have been doing in the name of “comprehensive” preservation planning. The plans are only “comprehensive” to the extent that they integrate and reflect the needs and concerns of the entire preservation constituency in the state. In other words, they are “comprehensive” if the sphere is defined as the state’s historic preservation needs, but they are “functional” if the sphere is defined as the state’s quality of life needs.

Special purpose or “functional” plans, like historic preservation, are a form of advocacy for the particular special purpose. But, to be effective and “comprehensive” statewide, there should be a central planning unit overseeing the coordination of all special purpose plans. The Historic Preservation plan can be the expression of historic preservation advocacy in the state, but it should also seek to be a component, the historic preservation element, of the comprehensive state plan if one exists.

The fact that the National Park Service renamed the “Resource Protection Planning Process,” “Comprehensive Planning” at about the same time that it started working with the American Planning Association, suggests that the intention is to push preservation planning from merely being “functional” to address a wider audience, and include a connection to

the larger sphere of planning.

Branch wrote in 1959, “ Essentially, comprehensive planning is concerned with coordination and with projection into the future.”⁸ The “coordination” element of comprehensive planning is, in fact, at the heart of the National Park Service’s current preservation planning advocacy. Some degree of coordination is expressed, though weakly, in the Secretary of the Interior’s Planning Standard III, which mandates that preservation planning “be made available for incorporation into broader planning processes.” Moving beyond the text of the standard, the National Park Service now strongly advocates “getting a seat at the table” or influencing other decision-makers in the state.

The 1959 Branch article was written at the onset of comprehensive planning. By the late 1980s, comprehensive planning had become well-established and was primarily a form of planning applied to communities. At a 1987 American Planning Association symposium on strategic planning , contributors Bryson and Einsweiler wrote:

“ As a result of legislative requirements and program guidelines, comprehensive planning typically is not ‘comprehensive’ at all but is tied to land use, public facilities, transportation, utilities, housing, and perhaps a few other functions. The functional plans often are not integrated with one another, and they typically ignore what government ought to be doing as contrasted to what it already does. The comprehensiveness now seems to come from adding up the separate functional parts ... not from thinking comprehensively and strategically about a community and what its government might do to improve it.”⁹

In terms of preservation planning, the difficulties to which they refer have certainly been a part of the difficulties many states have had in

developing their comprehensive preservation plans. The guidelines, oversight and requirement involved have clouded the essence of what the plan should do - identify, solve and avoid problems. Many state historic preservation plans fall into the trap of being the summary of parts without a comprehensive overview. Connecticut's plan is an example of such a plan, while Georgia's is more "comprehensive" in concept.

Often the statewide comprehensive plans take the form of a collection of guides to the historic preservation program and its history. These chapters in the plans, typically entitled "Legislative Framework," "Historical Resources in the State," "Evaluation of Properties," and "Development of Contexts," are really left over from the plans of the early 1970s which used the Park Service's three part format. The first two parts of that plan format were a historical background and the state inventory of historic resources respectively. Today's plans, when used as guides by the public or other agencies, might need these elements but, when used as a preservation strategy, is burdened by them. These sections draw together information that is often not collected anywhere else, and are important documents of history in and of themselves. They are often very articulate distillations of the legal and administrative apparatus of preservation in the state and could be a valuable promotional outreach effort if published as pamphlets. The Georgia plan, in fact does this by turning one such chapter into a slide show which is then used to get public feedback.

There have been other problems as well. McDowell warned that "failure to be selective enough" in defining scope "can bog down the preparation of plans with endless studies which prevent action. This is often referred to as 'paralysis by analysis,' a common disease of planning

processes.”¹⁰ In historic preservation, the dependence upon the unrealistic completion of state surveys in the plans of the 1970s was a similarly paralyzing element to preservation planning. Lawrence Aten’s 1983 explanation of RP3¹¹ pointed out the paralysis in preservation planning, stemming from what he called the “accumulation” strategy. RP3, he explained, was developed as an alternative. However, as Massachusetts State Historic Preservation Officer, Patricia Weslowski pointed out in her 1983 response to Aten, and as Nancy Miller, Deputy Director of the NCSHPO reiterated in 1991, RP3, with its elaborate context development requirements, later turned out to have a paralyzing effect on some state planning efforts for almost exactly the same reasons - the completion of all contexts was beyond the means and time constraints of the State preservation offices.¹²

Some of the specific issues surrounding the methodology and attitude of state historic preservation planning will be explored in greater detail in the next chapter, which looks at case studies of individual state preservation plans and the circumstances of their development. The key issues targeted are the degree of alliance-building attempted by state preservation planners, the approach to decision-making, and the role of the Park Service’s planning philosophy in the creation of two very different plans, Connecticut’s and Georgia’s. The case studies will continue the discussion of “comprehensive” versus “functional” preservation planning.

¹ Eugenie Ladner Birch and Douglass Roby, "The Planner and the Preservationist: An Uneasy Alliance," *Journal of the American Planning Association* 50 (Spring 1984), 194-207.

² Birch and Roby, 204.

³ Tiller, interview.

⁴ Frank S. So, Irving Hand, Bruce D. McDowell, eds., *The Practice of State and Regional Planning*, Municipal Management Series (Washington D.C.: The American Planning Association, 1987). A previous work edited by Frank S. So et al., *The Practice of Local Government Planning* (Washington, D.C.: International City Management Association, 1979), was referred to by Birch and Roby as "the profession's familiar green handbook."

⁵ So, et al, 9.

⁶ Melville C. Branch, Jr., "Comprehensive Planning: A New Field of Study," *Journal of the American Institute of Planners* 25 (Summer, 1959), 115-120.

⁷ Branch, 115.

⁸ Branch, 116.

⁹ John M. Bryson and Robert C. Einsweiler, "Strategic Planning," *Journal of the American Planning Association* 53 (Winter 1987), 6-8 at 7.

¹⁰ So et al, 10.

¹¹ Lawrence Aten, "Forum on Historic Preservation Planning: The Resource Protection Planning Process," *The Forum : Bulletin of the Committee on Preservation, Society for Architectural Historians* V (December 1983).

¹² Patricia Weslowski, *The Forum : Bulletin of the Committee on Preservation, Society for Architectural Historians* V (December 1983); and Miller, interview.

CHAPTER FIVE

CASE STUDIES

As McDowell emphasized in *The Practice of State and Regional Planning*, there is no “right way” to plan but there are some ingredients that improve the usefulness and efficacy of the state historic preservation plan. A “useful” preservation plan is one that actually has impact on the preservation and / or management of resources. The state historic preservation plan can do this in two ways: through the process and through the document. First, the process of developing the plan itself defines priorities for ongoing SHPO activities and identifies needs for new efforts. These activities, like review and compliance and survey grant awards, directly affect properties in the state. Second, the resulting planning document can affect the preservation of properties by influencing or guiding those that make decisions about them.

The state historic preservation plans that are currently published derive from the different periods of Park Service interpretation which were developed in previous chapters. Thus, they reflect an emphasis on alliance-building to a greater or lesser extent, depending upon when and by whom the planning process originated. Two case studies of state historic preservation plans are presented in this chapter to illustrate these varying responses to the comprehensive planning challenge. The state plans chosen, those of Connecticut and Georgia, are extreme examples - the former is an RP3 model and the latter a pioneering model for alliance-building.

Connecticut’s plan adapts the original RP3 concept to the particular

circumstances of the state and fully explores the scope intended by the model. Unlike many states which have used the RP3 concept in their preservation planning, Connecticut actually proposes to prioritize historic resources at the state level and make decisions about their appropriate treatment in advance of any project or threat. The final planning document represents a bold attempt to make RP3 work, even though preservation planning in Connecticut originated very much as a response to the requirements for federal funding, without which Connecticut probably would not otherwise have started a planning process.

In contrast, Georgia's Comprehensive Preservation Planner, Karen Easter has been a member of the NCSHPO's planning committee for several years. She has been a significant contributor to the re-evaluation of the planning requirements. As a result, Georgia's historic preservation plan became a model for the new "comprehensive" approach of the mid-late 1980s and is an attempt to "get a seat at the table." Elizabeth Lyons, Georgia's State Historic Preservation Officer, has demonstrated her commitment to the idea of planning by insuring that a professional planner is always included on staff.

The impact and outreach of the Georgia and Connecticut documents are quite different. Connecticut's very minimally provides plan users with a guide to the program and to the decision-making process of the SHPO. Georgia's provides more substantial direction for plan users and, in addition, includes suggestions for the preservation constituency in helping to achieve preservation goals.

Despite a difference in their commitment to planning and alliance-building, both Georgia and Connecticut have used planning techniques

which are tailored for their size and political circumstances.

Connecticut

Connecticut's plan, "Historic Preservation: A Cultural Resource Management Plan for Connecticut,"¹ attempts to use the RP3 context-based planning approach to get to the heart of preservation decision-making and come up with boldly pro-active preservation choices. However, it falls short of this goal due to significant problems with the process. According to both the Deputy State Historic Preservation Officer, Dawn Maddox, and one of the plan's principal plan authors, David Poirier, there are shortcomings of the plan which threaten to seriously undermine it.² The two main problems are that: a) Funding is insufficient to make much progress in the proposed implementation of the plan; and b) while the plan's decision-making philosophy is admirably far-sighted, the majority of the SHPO staff, who would be implementing the plan, do not support it.

Even though it was published in 1990, the plan does not include any of the newer interpretations of the National Park Service in terms of influencing others and "getting a seat at the table." Rather, it represents a process begun in 1983, when RP3 was being strongly advocated by the Park Service. According to Poirier, Connecticut "stalled for time" on preservation planning for as long as it could. The state started some public participation meetings to discuss and develop broad planning concepts in 1983, largely to satisfy the Park Service's minimal requirements at the time that the SHPOs be engaged in the planning process. However, when the Round Two program reviews started in 1986 the Park Service finally set deadlines³ for completion of the state historic preservation plan. At that point, Connecticut began to

develop its plan in earnest. This coincided with the 1986 Tax Reform Act which sufficiently reduced the applications for Tax Act certifications to allow a staff member to work almost full time on the plan.

The planning process was not something the Connecticut State Historic Preservation Office particularly believed in, but rather was seen as a necessary evil. The lack of commitment can be seen in the implementation problems which ensued.

The planning document was clearly intended as a management plan for the SHPO. Poirier remarked that "we wrote (the plan) as an in-house document."⁴ Yet even with as limited a scope as that, the plan does not accurately reflect the consensus of the Preservation Office. It is largely the vision of the authors and the Deputy State Historic Preservation Officer. Therefore, Poirier suggested that unless a directive from above is issued to the SHPO staff, the plan's implementation will be at the mercy of adverse office opinion.

The plan's decision-making philosophy is set forth in Chapter V:

"...Although identification of detailed protection strategies has been (and is) an emotional anathema to historic preservationists because of a reluctance to write off *any* cultural resource, full implementation of the State Historic Preservation Officer's proposed conceptual approach will:

- * increase public recognition, understanding, and support for the State's preservation programs as a result of its objectively based decision-making process;
- * facilitate review of federal and state-administered undertakings (as a direct result of the reduction of agency perceptions of SHPO decisions as arbitrary and capricious);
- * assist in-state preservation organizations further to refine and augment the preservation constituencies, resources, and long-term objectives;

* commit the SHPO to accountability for the professional implementation of the state's cultural resource management policies."⁵

This statement captures the daring spirit of this plan that makes it an interesting case study and an echo of the ideas of deTeel Patterson Tiller about preservation decision-making. Yet this plan also celebrates its ties to RP3 and represents a preservation planning approach that he reacted against. Because Connecticut's preservation planning process spanned the RP3 era and the more recent "comprehensive" era at the Park Service, it may represent something of a compromise.

The implementation of the plan sets out a two-step process for making decisions called Management Phase I and Management Phase II. These are an adaptation and variation of RP3's "operating" and "management" plans.⁶ However, both Phases correspond more to the "operating" plan in that they end up with developed priorities within contexts but do not attempt to reconcile the priorities across the state.

Connecticut started its RP3 process with a public participation seminar called the "Yale workshop" which involved the preservation constituency and the academic world to develop a framework for its historic contexts. The resulting contexts are based on six "landscape regions." According to strict RP3 guidelines, these would then be subdivided into time and theme categories, for a total of over 700 contexts. However, for the purposes of implementation and practicality, Connecticut decided to apply the planning strategies specified by RP3 for individual contexts to their broad geographic contexts. For example, the entire "Western Coastal Slope," an area along the Long Island Sound containing 11 municipalities, is managed as a single context. In terms of prioritization, the focus is on the completion of surveys

within these geographic contexts. The primary management tool envisioned by Connecticut was survey. An order of priority was determined at the Yale workshop which was then combined with the prioritization of the SHPO staff.

Even though it was ranked last by the public and fourth by the SHPO staff, the Western Coastal Slope was given top priority for survey completion based on Section 106 review and compliance needs for resource information, in anticipation of threats due to the impending expansion of the Merritt Parkway. It seems that the SHPO duties are the primary criteria by which the priorities of the plan were chosen. However, the seeming discrepancy between staff input and the final decision may be indicative of the serious weakness of this plan. The principal author, David Poirier, is both an archaeologist and the head of the SHPO environmental review and compliance section. The plan, both in its use of RP3 and its priorities, reflect his concerns and may be a divergence from the sentiments of the SHPO staff and public.

Management Phase I directs survey and planning grant-in-aid money to the development of town surveys in the top priority geographic context. The goal is to complete all town surveys within each of the context regions. In Connecticut the town is the operative political unit. There are no counties and thus the geographic contexts are apolitical regions. The plan explains the importance of this approach in Connecticut:

“ The SHPO’s town-based inventories are the framework which anchors its other preservation programs. All programs and planning decisions must interface with and be outgrowths of the town-based inventory data.”⁷

The inventories are intended to provide the information for the decision

making of Management Phase II, subtitled “Matrixes : Finite protection policies.” The surveys also enhance local cultural resource visibility and protection, and are useful to local governments and historic preservation organizations for decision-making.

In Management Phase II a context management plan is developed from the Phase I inventory information and choices are made for the resource types and individual properties identified. Phase II assigns a “finite protection policy” to each property identified in the contexts. There are three “policy” options: conservation, re-use / rehabilitation, and interpretation / research (a euphemism for demolition after recordation).

The decision-making attempted in Management Phase II, is the part of RP3 that is most often avoided by preservationists. So far Connecticut has completed in draft form two of the geographic context-management plans called for in Management Phase II. However, the funding limitations of the SHPO have not yet allowed the publication of these. These drafts do not actually prioritize the resources they identify. The draft, “Western Coastal Slope: Historical and Architectural Overview and Management Guide,” stops short of making the “finite protection” decisions promised by the plan. This might seem to undermine the credibility of the SHPO with those who use the plan, especially those other agencies that interact with the SHPO in a regulatory capacity and that might have expected to benefit from those proactive decisions. Poirier was not concerned about this. He did not see the outreach and communication potential of plan as a real consideration in Connecticut’s preservation planning process.

During the protracted planning process, the SHPO developed a new statewide National Register policy in 1986 which stated that no more single

property nominations would be processed by the SHPO, unless time permitted. Nomination priorities were established which gave preference to multiple-resource nominations. In the linkage of the statewide inventory to the National Register, the town-based surveys became potential multiple resource nominations.

The plan describes SHPO initiated programs which exemplify a more “comprehensive”, alliance-building approach to preservation. For example:

“ For the past several years, the SHPO has used its interagency environmental review role to advocate that Connecticut’s Community Development Entitlement & Small Cities applicants execute programmatic memoranda of agreement [MOA] which explicitly bind local communities to the professional undertaking of town-based historical & architectural surveys and to the programmatic application of the Secretary of the Interior’s Standards for Rehabilitation. Connecticut’s community development participants, the Advisory Council on Historic Preservation, and the SHPO have found this approach preferable to a case by case review of the participant’s extensive town-wide housing rehabilitation program.”⁸

By 1990, 24 communities had MOAs. The program is a way of coordinating and building cooperation within the preservation network, streamlining the state historic preservation regulatory process. These efforts were not seen as part of planning by Poirier even though the alliance-building is very pro-active. But he mentioned a related effort which he identified as a direct outgrowth of the plan. This is the development of a collaboration with both the Department of Transportation and with the U.S. Coast Guard to create context-based MOAs for highway bridges and lighthouses respectively. As Poirier sees it, this is related to planning in that it is a way of completing more contexts and implementing the decision-making

that the plan envisioned.

The small size of the state is a factor in what appears to be its survey-bound approach to the use of RP3.⁹ The context-management plans, which according to RP3 are supposed to anticipate patterns for resource types, instead are dependent upon accumulated town surveys which need to be complete before the true planning in Management Phase II can begin. Unfortunately, the financial resources of the SHPO are not up to this task. As a result, the process will be very long.

Connecticut's plan is narrowly focused on context and survey based management. It leaves out of its goals and implementation strategies the alliance-building programs and activities in which the SHPO engages, such as its MOAs. If these were to be integrated, the plan's scope and perspective would be more comprehensive and less dependent upon bold but unrealistic implementation methods.

Georgia

As the largest state east of the Mississippi, Georgia has more counties (192), than Connecticut has towns (169). The focus of each state's preservation plan is related to state size. In a small state such as Connecticut, because the SHPO may be much more in touch with individual properties statewide, it may make more sense to make property-level decisions in a statewide plan, as Connecticut tries to do with its Management Phase II. However, in a large state, like Georgia, it is more appropriate to direct resource-level decision-making to the regional and local levels, and to concentrate on alliance-building and policy at the state level.

"A Vision for the Future: The Georgia Historic Preservation Plan" ¹⁰

does this by keeping a fairly broad tone and highlighting the various roles of the different levels and organizations involved in the entire preservation network. The Georgia plan states that:

“The Comprehensive Planning program was created in the mid-1980s to prepare a state historic preservation plan, oversee the implementation of the plan, establish ongoing contact with state agencies and organizations, and gather information and analyze trends, policies and legislation. An important part of the program is the development of preservation planning methods for use at the regional and local levels.”¹¹

Throughout, the plan emphasizes the themes of partnership, outreach, alliance-building and comprehensive planning. The plan describes the SHPO as the “liaison among all levels of the preservation partnership” and further states that “...to be comprehensive, [Georgia’s historic preservation plan] must consider national, statewide, and local issues that are significant to all of these organizations.”¹² This attitude is a contrast to Connecticut’s approach. A further contrast with Connecticut can be seen in the goals of each plan. Goal One in the Connecticut plan is to target grant-in-aid assistance to the priority one geographic context for the completion of town-surveys there.¹³ Georgia’s Goal One is to achieve the “inclusion of historic preservation in local, regional, state, and national planning,” in other words, to “get a seat at the table.”¹⁴

The broad statewide goals of the Georgia plan are more like statements of policy and intention. The plan includes extensive data analysis sections which balance resource information with situational existing conditions to generate implementation strategies. These are carefully divided into objectives, which are directed specifically to the SHPO, “suggestions for others” which is a mild way of including outward-looking objectives for

others, and an “action plan,” which is an annual update to the comprehensive plan. The combination represents an attempt to extend influence without overstepping feasibility or effectiveness.

The Georgia plan seems to work as one planning machine rather than as a collection of required parts. The focus seems to be on making the plan a usable and lively document. Its clarity and didacticism make it an outward-looking publication designed for public education. The SHPO attempts to “get a seat at the table” by making its program accessible through the plan. Yet the title of its “Suggestions for Others” chapter also reflects the limited role of the SHPO to influence the larger sphere.

This chapter represents the plan’s most significant departure from the RP3 model. “Suggestions for others” attempts to export the goals and objectives of the plan to others who have influence on historic resources. The chapter opens with this statement:

“The eight goals defined in Chapter 8 are for the entire preservation network. The objectives in that chapter are strategies that HPS has adopted to help it fulfill its mission as the statewide public agency for preservation. Others in the network have their own objectives which are needed to reach these common goals.

This chapter contains suggestions of other actions that need to be taken. Each member of the preservation network defines its own priorities and plans its own activities, so this list is not intended to be comprehensive or mandatory. Rather the suggested actions indicate ways in which preservationists throughout Georgia can work cooperatively to meet needs identified through this comprehensive planning process.”¹⁵

According to Karen Easter, the “Suggestions for Others” section was the most controversial. Georgia’s preservation constituency was concerned that the

SHPO was trying to dictate to them. Thus the language of the plan about this section is cautious. The Georgia Trust for Historic Preservation, the statewide private, non-profit organization, was very much involved in the development of the plan. However, Easter noted that it did not feel comfortable with the plan's "ownership." It was essentially still the SHPO's plan. Subsequently, the Trust has undertaken its own comprehensive planning process which came up with similar goals as the state plan. The problem of "ownership" has limited the ability of the SHPO to influence others and explains the conciliatory approach taken in "Suggestions for Others."

An important aspect of the Georgia plan is its emphasis on the analysis of existing conditions for preservation. As has been repeatedly stated by the Park Service and the NCSHPO in the past four years, though the Secretary of the Interior's Planning Standards I & II mention that contexts must be a part of preservation planning, they do not say contexts are the *only* part. In particular, Standard II says that planning uses contexts to develop goals and priorities, but does not exclude other input into the development. Georgia's preservation planners have been instrumental in convincing the Park Service to require the input of both resource-based data and non-resource-based existing conditions such as political, social, and economic trends.

The Georgia plan's format illustrates the authors' commitment to a "comprehensive" approach by giving equal weight and space to non-resource-based existing conditions as well as to context input. The "Influences on Historic Properties" chapter details trends in population, government, the economy, transportation, tourism and preservation. The "Existing Mechanisms for Preservation" chapter provides a user's guide to the preservation network and programs. Together, these chapters take on a

powerful didactic significance. They are well written and crafted as guides for others not for the SHPO staff. Each of the trends noted in the "Influences" chapter are followed by "Effects" to explain how they relate to preservation. Similarly, the "Existing Mechanisms" chapter includes an "Assessment" of both the network and the programs. The "Conclusions - Needs" section proposes new alliances, working relationships, the education of other state agencies, and the definition of various organizations' roles.

The "Effects," "Assessment," and the concluding "Needs" sections embody the analysis and evaluation that make the document more than a collection of guides to the preservation program. They are the planning element and provide explanatory background for the goals. In these sections are substantive suggestions for improvement. In addition, the language of advocacy and suggestion is used throughout the data sections, which lends a more pointed role to these required chapters.

For resource-based data, the plan explains the rather complex approach to contexts that Georgia has developed. Like Connecticut, Georgia stresses the town as an important and efficient unit for resource management. The Georgia plan describes three different types of contexts that should be developed: community, thematic, and archaeological. The "community" context is essentially a resource-oriented town history and can be developed out of the town surveys that are already being funded by the SHPO. These could eventually become multiple-resource National Register Nominations. The "thematic" context addresses those types of resources which are more significant as a group statewide than locally, such as transportation networks. These are linked to thematic National Register nominations. The "archaeological" contexts are geared more towards providing a framework for

predicting the location of sites, and to evaluate those that are discovered.

The Chapter of Georgia's plan on the contexts is the weakest. It is complicated and less accessible than the other chapters and does not clearly indicate the priorities and implementation strategies of the SHPO. The decision-making step which is so emphasized in the Connecticut plan is down-played here. The specific suggestions for treating individual properties is at the end of a long list of the steps to take in developing a context. These treatment decisions are also kept within the realm of the contexts, which are presented as accessory planning tools, and not included in the implementation objectives of the plan.

Outreach efforts are a part of Georgia's planning process. The plan's chapter, "Influences on Historic Properties," has been made into a slide show for public dissemination designed to get feedback. This is a very important use of the plan and is also a way of implementing the goals.

An example of Georgia's commitment to alliance-building and planning has been the Regional Preservation planning program initiated by the SHPO in 1978 to address the need for decentralized decision-making. The program is also an important implementation strategy for Secretary of the Interior's Planning Standard III, ("The results of preservation planning should be made available for integration into broader planning processes"¹⁶).

Preservation planners were hired to work in collaboration with regional planners to more effectively address individual resources and provide technical preservation planning assistance to local governments. Of the eighteen regional planning offices, there are currently thirteen with preservationists on staff. According to Karen Easter, the SHPO relies on these regional preservationists quite a bit, especially as liaisons to local

governments which, under Georgia's 1989 State Planning Act are required to develop preservation plans. These regional preservationists are actively exporting preservation and bringing its goals directly to the planning "table," not simply making them "available." Georgia's approach to Standard III is the source for the Park Service's 1991 "Concept Paper"¹⁷ on preservation planning which criticizes the limitations of Standard III.

Georgia's continuing commitment to planning is shown by the provision of the "action plan" which is an annual update to the state historic preservation plan and also serves to answer program review requirements. Easter was very enthusiastic about the positive effects the comprehensive preservation planning process has had in the state. She mentioned that the SHPO decisions were more clearly focused, such as what kind of alliances to form and with whom. Also the plan provides a valuable model for local governments to follow. The success and approachability of the plan have inspired other organizations such as the Georgia Trust to undertake their own planning processes.

Case Study Conclusions

In comparing Connecticut's and Georgia's plans, the chapters which shine tend to reflect the experience and concerns of the authors, one an archaeologist / environmental reviewer and one a planner respectively. Contexts are important and well represented in the Connecticut plan while the "Influences" and "Mechanisms" sections of the Georgia plan are the strongest. These clear biases do not serve the planning process or document well because valuable perspective and objectivity is compromised. All aspects

of the state historic preservation program should be equally weighted in the planning process.

For example, the state-run Section 106 process could specifically benefit from the statewide plan by the identification of resource priorities and the formation of intragovernmental alliances. Connecticut's plan shows that it was authored by the Review and Compliance Coordinator in its attempt to nail down preservation decisions and in its priority choices. The SHPO needs to choose the arenas of preservation battles carefully and also should make the regulatory process more predictable for its consumers.

The alliance-building techniques, such as Connecticut's MOAs for environmental review, might facilitate the development of joint programs with federal agencies which could anticipate and diffuse regulatory problems and delays, (ie. develop a HUD rehabilitation program based on the Secretary of the Interior's Standards for Rehabilitation). The Connecticut program showed how important Review and Compliance can be to alliance-building efforts. The Review and Compliance sections should be very involved in the state historic preservation plan.

One of the weaknesses in the comprehensive planning process of the states has been that, while there is a well developed way to collect resource data, non-resource-based existing conditions and trends are neither collected nor organized by the State Historic Preservation office. The collection of resource data by survey and its analysis through registration has been a focus of the last twenty-five years of preservation activity. However, very little attention has been given to analysis of the conditions under which preservation has operated. The Park Service has worked out the historic context as a way of making the resource data into a planning tool, but it is

only in the last few years that it has emphasized the other type of data that must be a part of the plan. The guidance from the Park Service in conjunction with the NCSHPO, has suggested that the SHPOs use studies and analysis that have been prepared already by others in the planning or academic fields. This type of non-resource data collection is exactly the kind of analysis that is taught in planning schools and is practiced regularly by local governments, political lobbyists, and scholarly analysts. Georgia's answer has been to hire planners on its SHPO staff.

If, as the Park Service has implied in its planning advocacy of the past several years, non-resource-based data is to be given equal weight, the SHPO clearly will need to turn to outside help for this kind of analysis unless, like Georgia, it can hire in-house planning expertise. This is another opportunity for alliance-building through the planning process itself. The exchange of data and analysis with other organizations, agencies, schools, and private professionals can serve preservation well in its general outreach effort.

The idea of making choices, which the Connecticut plan boldly introduces is an important step for preservation planning, even if it was not well supported in Connecticut. However, to avoid committing to recommendations of treatments for specific resources, and thus perhaps avoiding the opposition encountered in Connecticut, a plan might instead establish a ranking system within which more flexible decisions could be made. There are models of ranking systems that deal with similarly unquantifiable things, such as the value of farmland.

An example is the the Land Evaluation and Site Assessment (LESA) system for ranking farmland. The LESA system uses a weighted point assignment with factors such as soil quality, proximity to other farmland,

access to public facilities, and local farmland preservation involvement. This system is modified to include locally specific values and criteria. The scores are weighted by each jurisdiction that uses the system according to the specific purposes for the evaluation.

The LESA system is the product of land-use planning, which is after all what preservation should be a part of. It reflects the willingness, indeed the necessity of these planners to make choices even among things that are almost impossible to rank. Preservation needs to be equally brave and forward thinking. As Tiller has emphasized, somebody is going to make those choices, and it is better if it is the preservationists. The creation of a ranking framework would furthermore give other users of the plan or of the data base, something to read in order to understand the preservationists' perspective

The shortcomings of the Connecticut plan in implementation and process will lead even the most interesting planning ideas to be undermined. The concept was very much that of an in-house document with no thought given to what the document itself might offer in the way of promotion, education or influence. The plan's authors have compromised the SHPO by publishing a plan that has very little real support and have risked the SHPO's credibility with others. Georgia, however, is committed to the idea of planning and their plan is working well. It has become a useful document and the implementation was fiscally and politically feasible. The planning process benefited greatly by being in the hands of a trained planner.

¹ Connecticut Historical Commission, (SHPO), "Historic Preservation: A Cultural Resource Management Plan for Connecticut", Hartford, 1990.

² Dawn Maddox, Deputy State Historic Preservation Officer, and David Poirier, Staff Archaeologist and Environmental Review Coordinator, both of the Connecticut Historical Commission, April 8 and April 14, 1992, respectively, telephone interviews with the author.

³ The perception that there was a deadline set in 1986 is from David Poirier. However, NPS-49 includes only certain parts of the plan as requirements for Round Three reviews and Tiller has said that there is no specifically required plan until 1993. The differences in perception of what is required for a state historic preservation program to receive its federal apportionment are indicative of a communication gap. This should not be, after all, a matter of opinion but of fact. The reviews and the oversight may be inconsistent from Regional Office to Regional Office and thus appear arbitrary to some states. The credibility of the Park Service with these states is low. This is a difficult atmosphere in which to introduce a new philosophy of planning. Tiller recognizes this problem as a major obstacle to his continuing advocacy of "getting a seat at the table."

⁴ Poirier interview.

⁵ "Historic Preservation: A Cultural Resource Management Plan For Connecticut", 86.

⁶ When Lawrence Aten explained RP3 in 1980, he wrote: "The format consists of identification and definition of historic contexts; development of 'operating plans'; and the implementation of 'management plans.'" (Aten as quoted in Connecticut's plan, 50.) The "operating plan" is a set of context goals based on research needs, the ranking of property types, evaluation of threats, and administrative mechanisms. "Collectively, the goals for a historic context should be a coherent statement of program direction." (US Dept. of Interior 1983, as quoted in Connecticut Plan, 53). A management plan is the sorting out of context goals which overlap geographically or which compete with other goals and priorities. These components of RP3, in particular the "operating" plan are very much susceptible to the criticism of Bryson and Einsweiler that the so-called "comprehensiveness" of a plan "seems to come from adding up the separate functional parts ... not from thinking comprehensively..." (Bryson & Einsweiler, 7)

⁷ "Historic Preservation: A Cultural Resource Management Plan For Connecticut," 71.

⁸ "Historic Preservation: A Cultural Resource Management Plan For Connecticut," 71.

⁹ See Aten for a discussion of "accumulation" vs. "alternative" planning. These ideas are discussed in chapter 3 of this thesis.

¹⁰ Georgia Department of Natural Resources, Division of Parks, Recreation, and Historic Sites, Historic Preservation Section, "A Vision for the Future: The Georgia Historic Preservation Plan," Atlanta, 1989.

¹¹ "Georgia Historic Preservation Plan," 5.

¹² "Georgia Historic Preservation Plan," 7.

¹³ "Historic Preservation: A Cultural Resource Management Plan For Connecticut," 91.

¹⁴ "Georgia Historic Preservation Plan," 16.

¹⁵ "Georgia Historic Preservation Plan," 96.

¹⁶ U.S. Secretary of the Interior, "Standards for Historic Preservation and Archaeology," (48 FR, No.190, Part IV & 36 CFR 61.4 [b](3)).

¹⁷ National Park Service, 1991, "Historic Preservation Planning Process." See Chapter 3 of this thesis, particularly page 38, for more discussion of this document.

CHAPTER SIX

CONCLUSION

Some preservationists have expressed the belief that the State Historic Preservation Offices (SHPOs) should concentrate their energy and resources on what they do best and only address the concerns over which they have direct control. This stance, which may sound reactive and old fashioned, more likely results from the limited funding available to satisfy what have become the large and complex assortment of requirements to be an "approved state program".¹

Does the development and continuing expansion of NPS-49 imply an expansion of SHPO duties? It shouldn't but in reality, the more specific the instructions as to how to apply its requirements, the more work the SHPOs believe they must do to prepare for the reviews. This causes a further crunch on SHPO time and resources. In fact, both the Georgia and Connecticut preservation plans include goals to reduce such "procedural delays." According to Nancy Miller,² Deputy Director of the National Conference of State Historic Preservation Offices (NCSHPO), there is an attitude prevalent in many state historic preservation offices that "preservation" is comprised of activities that deal directly with properties - such as survey, nominations, Section 106 reviews, and grants to local governments - and that all the rest is bureaucracy, pure and simple. Not only is the annual and periodic review put into this category but also planning itself, as it has been so closely linked to the reviews. The idea that these are luxuries, items that waste time and do not actually "preserve" anything has perhaps come out of the long period of

confusion over a difficult planning model that did not in the end actually yield a workable plan. Perhaps it also comes from the overall ineffectiveness of many past plans.

Phyllis Ellin, a Park Service program reviewer, believes it to be a problem that SHPOs see “planning” as a separate activity requiring extra time, personnel, and money.³ She feels that planning, rather, ought to be an integral part of ongoing activities, a way to make other necessary activities work better, and that it is not an end in and of itself. However many of the SHPOs see it differently. They have seen how much time the planning studies, the analysis, and the meetings have already taken. Indeed, in order for a plan to accomplish what the Park Service is now advocating, preservation planning must become initially (and periodically to update it) its own activity.

The state plan *is* a product. It makes conclusions and represents a perspective gained from taking time out from daily work to look at the data in a broader context. Ultimately, it should become an enabling framework for other activities. To do so, it must be allotted the time necessary to be produced. To plan and develop objectives and goals is to take time to analyze data in a reflective way to gain perspective. The document itself must be polished in order to be useful to the “larger planning arena.” In order to do the job of creating an effective preservation plan, SHPOs like Georgia’s must truly invest time and money in the process. In the program reviews, the cost and priority of preservation planning is a major issue for the states. And, as Ellin’s remarks suggest, there is a difference of opinion between the Park Service and the SHPOs. All of the SHPO staff members interviewed for this thesis felt that, at some level, the Park Service did not have a sense of what it

is really like to run the State Preservation Offices.

deTeel Patterson Tiller strongly feels that federal oversight of the historic preservation programs is very much out of proportion to their size. For a federal program with a budget that is only \$25 million, the amount of oversight by the Park Service is far too great. Much of what Tiller has been trying to do in the Interagency Resources Branch has been to phase out some of the oversight. He says that he is supported by his superiors in the Park Service. The NCSHPO has been advocating this for years and now, it appears, the Director of the Park Service is beginning to agree.

For example, for years there have been two layers of Park Service review of the State Programs - first, the annual grant application for funding which started in the early 1970s and second, the three-year program reviews, mandated by the 1980 Amendments and started in 1983. The program reviews were originally supposed to replace the annual review but did not. What resulted was what Tiller calls a "double whammy," which was the source of anger and frustration in SHPO offices.

Tiller thus acknowledges that the Park Service's record has not been good with the states. First, it developed RP3 and initiated a long period of confusing and time-consuming direction to states about planning. Second, The Park Service has seemed to be constantly reviewing and picking apart the SHPO programs, both on a project by project level (annual) and programmatically (three-year). When this difficult relationship with the Park Service is coupled with the bad economic times in most state governments, it seems that this is an unfortunate starting point for a new planning advocacy.

Tiller feels that the Park Service is slowly "chipping away" at the resistance and friction. He thinks that states are beginning to "come around"

and see that planning can be beneficial and considerably less inscrutable than it has been. He also feels that if it “sticks” now, under adverse conditions, comprehensive preservation planning will probably flourish and do well.

In a recent issue of the National Trust’s journal, *Historic Preservation Forum*, devoted to “Coping with the Economic Downturn,” Donovan Rypkema contributed an article in which he suggested that a recession was the best time to plan for preservation. He wrote:

“ Not unlike historic preservation officials, planners are often placed in the position of having to react to development activities instead of anticipating and preparing for them. Planners can be expected to use this breathing time to review and revise comprehensive plans and other regulatory measures. Now is the opportunity for preservationists and their organizations to assure that historic preservation is a central element in comprehensive planning efforts parallel to transportation, housing, recreation, and public infrastructure.”⁴

Rypkema also noted the opportunity for “organizational planning” to help shape the evolution of preservation organizations.

However, there is a potential for the Park Service’s new planning approach to become just as ambiguous and vague as was the use of contexts. This could happen if there continues to be a disparity of interpretation between the Washington and the Regional Offices. Also, if the new avowed flexibility and relaxed oversight of the Park Service start to contradict the NPS-49 requirements there may be further confusion. The interpretation of the “broad characteristics” that Tiller says are the only requirements for the state plans is vulnerable to the same sort of misdirected focus from which RP3 suffered. In general, time may prove valuable here in getting everyone on the same side and in clarifying (and disseminating to the Regional Offices)

the philosophy of the Washington Office. More specifically, the proposed planning institute with the APA is one way to address this weakness by giving SHPO and NPS professionals the opportunity to become formally trained in the use of planning techniques.

The new emphasis by the Park Service on active integration of historic preservation planning with other planning may be the hardest for the SHPOs to achieve and may cause the greatest dismay among them. The process, especially if a SHPO has not been in a good position to influence others, could be time-consuming or politically impossible. The case of Georgia reveals that, while some integration is achievable, such as the Regional Preservation planning program, the SHPO has to be careful about how it recommends objectives for others. Truly active measures to influence others, like the Georgia program, could require meetings, programmatic coordination, extra publications, etc. which would, like the responsibility to produce contexts, further strain the demands for staff time in not only the SHPO but in other state offices as well.

The planning document itself may be a way to accomplish this initially without significant added input from the SHPO. While the planning process is important for the resources and for the SHPO's management of the preservation program, the written document that results may be more effective as an implementation of an objective, namely - the attempt to influence and inform other decision-making bodies and planners. Therefore, the plan itself should be short, compelling, and very clear in its recommendations. It should not contain the preponderance of guides to the programs that they now contain - it should be its own executive summary or have one available for general consumption.⁵

The planning *process* , on the other hand, as a way of consolidating support for preservation programs, developing new ideas, and testing existing programs against the larger preservation vision, might be made more effective if the involvement of the entire statewide preservation constituency, particularly the private groups, is made meaningful. Perhaps more emphasis should be placed on joint authorship of the plans.

It is thus only *after* the collection and analysis of data that the preservation planning process really begins. The process should use the data to anticipate needs and threats and to develop pro-active programs to address them in the long term. The planning process can be useful in three key ways. First, the recognized needs might lead to the unilateral initiation of new programs by the preservation community, such as the National Trust's Rural Conservation Program. Second, the planning process can involve other planning bodies and agencies out of which might come collaborative new programs to address mutual needs and threats, such as the national Heritage Coalition of preservation and conservation advocates which seeks federal legislation for more funding. Finally, the planning document, if extremely clear and accessible, can provide other planning bodies and decision makers the information and direction to unilaterally develop or revise programs that support historic preservation goals.

To achieve this last objective, historic preservation plans need to be more than an explanation and / or guide to the historic preservation program. They need to express analysis and evaluation of that program and a vision for its future.

Conclusions Applied : New Jersey

New Jersey is in the process of completing its historic preservation plan. Both Georgia's and Connecticut's plans were among those analyzed by New Jersey's authors for format, content and style. The New Jersey authors are looking more towards the Georgia example than the Connecticut, even though New Jersey closely resembles Connecticut in many key respects. They are interested in making their plan an accessible document and the planning process meaningful, as they perceive Georgia to have done.

In New Jersey, the idea of influencing others through comprehensive planning has a strong precedent in the Pinelands Commission Comprehensive planning process. The Pinelands Comprehensive plan⁶ was published in 1979 after an extensive and involved coordination process between state agencies, county and local governments, and federal agencies. The plan includes a substantial section devoted to listing various ways in which each player in the total land-use arena can contribute and aid the goals of the Pinelands Comprehensive plan. Because of the structure of the Pinelands Preserve as a public / private, statewide / local partnership, intergovernmental coordination is a natural and essential part of the whole picture. This should be equally true of historic preservation, even though the SHPO does not have the authority over local governments that the Pinelands Commission does. The statewide historic preservation plan could devote a comparable amount of attention to intergovernmental coordination which makes the plan "comprehensive" and is a form of alliance-building.

State historic preservation plans should address the coordination and roles of levels and agents of government, private sector interests, and private non-profit preservation groups. Planning should reveal the needs

and opportunities for alliances between preservation and other interests in addressing new programs and advocacy. The state historic preservation plan should be more than a planning document authored by the State Historic Preservation Office (SHPO), with the comments of a committee. It should be a true collaborative effort, a forum for cooperation, amongst the leading preservation and planning groups of the state - whether public or private. This would mean that the SHPO and by extension, the National Park Service would have to set aside the operating notion that state and federal preservation agencies are the movement leaders and the sole spokesmen for preservation. Perhaps the plan should be more broadly funded , in order to free it from those biases.

The relationship between funding and preservation is critical to the planning process. The reason why many plans remain unused on a shelf is that the money is not there for the implementation activities. In Connecticut, the fact that the plan's implementation was dependent upon surveys and the computerization of data which the state could not afford to pursue derailed the whole concept of decision-making in Phase II. This surely needs to be addressed in the planning process by incorporating implementation and goals which match the fiscal realities of the state historic preservation office. Funding can change so this can only be done to best abilities of the planners based on past experience and political circumstances.

A strategy for making the plan effective within budgetary constraints might include proposing implementation and objectives which do not, as in Connecticut, all depend upon an expensive and time-consuming first step. Rather, a plan should include a variety of measures that can be accomplished independently, and also those that could be accomplished for relatively little

money. For example, much of Georgia's implementation is based upon ongoing planning activities within the SHPO, which are relatively easy to accomplish. Also the Georgia Regional Preservation planning program makes connections to local governments and furthers preservation concerns without depending upon a completed survey of every town.

In New Jersey, as in most states, there are serious budgetary constraints for preservation, but there is also a ballot initiative bond act which has provided a \$25 million fund for preservation projects. These funds are distributed to non-profit organizations and local governments for "bricks and mortar" preservation projects by the New Jersey Historic Trust, a state governmental organization. The grants made under the bond act are given out based on generally agreed-upon priorities, which ultimately need to be articulated and reconsidered with respect to the planning goals in the state historic preservation plan.

The New Jersey historic preservation program has very few programmatic Memoranda of Agreements (MOAs). One way for the SHPO to use its planning time to reduce administrative time is to develop plan-generated MOAs with other agencies or municipalities, thereby reducing Review and Compliance staff time and contributing to the streamlining of economic development activities.

A recent report issued by a Governor's special task force on New Jersey's regulatory structure essentially labeled the SHPO's regulatory activities as an "obstruction" to the economic development of the state.⁷ Rightly or wrongly, the perception voiced in a report coming from the Governor's office suggests that more alliance-building is needed. Using Connecticut's MOA programs as a model, the SHPO may be able to leverage

some contributions from other agencies in the joint production of a related context, survey or plan element, and in exchange, could give some regulatory relief to those agencies, which could only serve to improve the SHPO image. Thus a plan-generated MOA could be a way to use the plan to address funding problems.

Funding can further cause problems for preservation planning through so-called "pork barrel" projects, which are large Congressional appropriations for specific projects. An example is New Jersey Senator Frank Lautenberg's 1991 appropriation of approximately \$4.5 million for Urban History Initiative Projects in Trenton, Perth Amboy, and Paterson.⁸ When compared to the approximately \$1 million annual budget of the State Historic Preservation Office, out of which must come both operating expenses and survey and planning grants, the financial windfall represented by the "pork barrel" project can warp the focus of preservation in the state. The SHPO's survey and planning grants, which are typically around \$10,000, are selected according to criteria related to planning priorities for the state. However, these are dependent upon the applications of municipalities and counties willing and able to match the funds. In contrast, the \$4.5 million is not a match and was not allocated according to the Office of New Jersey Heritage's criteria. Instead it was a part of the National Urban History Initiative and is thus part of a national preservation planning sphere. Lautenberg's use of this national initiative fit into the goals of the 1991 New Jersey State Development and Redevelopment Plan, "Communities of Place,"⁹ which clearly expresses a priority for urban revitalization.

The Office of New Jersey Heritage needs to find a way to benefit from Lautenberg's (and the public's) obvious interest in preservation as a popular

cause. Their planning could attempt to tap into these large projects and the national agenda both through the process - by getting input from Lautenberg - and through the document - by making it a clear expression of what is important in the state in terms of historic preservation. This could be done specifically by making "suggestions for others" which identify how large projects could fit into the statewide preservation goals. In addition, the plan could have more momentum if it were specifically endorsed by the Governor and the State Planning Commission.

As many preservationists now are fond of saying, historic preservation is growth management. A state historic preservation plan can clarify and promote this view if an effort is made to 1) involve planners in the preparation of the plan, 2) make the plan follow a standard format for land-use planning that is consistent with and could be part of a larger statewide growth management plan, and 3) make the plan a model for local governments to use when planning for preservation. The completed Historic Preservation plan should be adopted formally by the state planning office and if possible incorporated as an element into the comprehensive or growth management plan of the state.

The recent statewide planning activities in New Jersey offer an opportunity for historic preservation planning to be done in an atmosphere of increased planning awareness. The recent publication of the New Jersey Development and Redevelopment Plan, "Communities of Place," was the result of a lengthy public participation process called "cross acceptance" in which county and local governments as well as individual citizens were given an opportunity to comment on and make suggestions for the final plan. This plan is essentially a growth management effort to direct

development toward appropriate areas and away from areas that should be protected, like farmland and environmentally sensitive lands. Its section on historic preservation is brief, but offers an opportunity for the state historic preservation plan goals to be integrated into a broader process. The New Jersey preservation plan should coordinate with this important state planning effort so as to draw some power and support from it.

In order for the New Jersey State Historic Preservation Office to “get a seat at the table,” it needs to make its decision making process clear and predictable, its data accessible and understandable, and link its priorities and goals with other important concerns in the state, such as affordable housing, and inner city revitalization. There are also important roles in the state preservation arena that are not being filled adequately, such as effective lobbying and preservation education. Similar needs may be found in most states and can be similarly addressed in the planning process.

The state historic preservation plan can help in a few key ways. By using the Georgia plan as a model, the decision making and data of the SHPO can be made clear to other state agencies, federal agencies, local governments and the public, by making the preservation plan dynamic, streamlined, and informative. The elements that are required by the Park Service, such as an explanation of the planning process and the authority for preservation in the state, can be turned into helpful pamphlets. If the plan was pared down to an executive summary or short version, the more cumbersome but necessary components, such as legislative history could be included as additional pamphlets that could go out only to those who require that information.

In addition, the Office of New Jersey Heritage can use the statewide planning priorities articulated in “Communities of Place” as well as the in-

house analysis of statewide trends generated by the planning process to identify areas or departments that are suitable for targeted alliance-building and program development. This effort could be further parlayed into important alliance-building with preservation partners such as the private non-profit group, Preservation New Jersey. A joint preservation conference could be held to identify opportunities and develop new programs aimed at joining preservation concerns to others, such as urban rental rehabilitation programs or public school education.

New Jersey, known as a "home rule" state, has strong local governments which are important preservation partners for the state office to cultivate. Given the political balances in the state, technical assistance may work better than dictated or even suggested actions to local governments. The strong state planning framework that produced and supported "Communities of Place" could increase its influence to eventually require local historic preservation plan elements. As a result, municipalities may become more and more interested in preservation planning. Therefore, if the state historic preservation plan includes a section on local preservation planning that explains why it is important and provides a model, it could be the most effective way of "influencing others," as Georgia's plan has done.

All states can use the flexible elements of state historic preservation planning to address particular state needs and concerns. They must take the planning process seriously, and make the investment in time and effort to build alliances for an improved program with greater influence. Obviously, a plan alone cannot achieve this without support, as Connecticut's plan has shown. However, the professional state planning process sets up a philosophical framework for adding vision and perspective to the business of

running the preservation network. This can be extracted from the intimidating specter of program review and bureaucratic oversight. There is vision in the Park Service and in the NCSHPO which can be tapped by the SHPOs to help them make their plans into real preservation tools.

¹ An attitude expressed at the 1991 Historic Preservation Conference ("When the Past Meets the Future"), and through conversations with: various staff members in the New Jersey SHPO, the Florida SHPO, the Connecticut SHPO, Nancy Miller, Deputy Director of the NCSHPO, and Nellie Longworth, President of Preservation Action.

² Miller interview.

³ Ellin and Chapman Interview.

⁴ Donovan Rypkema, "The Recession: Good News in Bad Times," *Historic Preservation Forum* 5 (May / June 1991), 24 - 25.

⁵ Both the Connecticut and the Georgia plans include the production of an executive summary in their objectives.

⁶ New Jersey Pinelands Commission, "Comprehensive Management Plan for the Pinelands National Reserve and Pinelands Area," 1980.

⁷ This information is based on an informal conversation with Nancy Zerbe, the Deputy State Historic Preservation Officer and Administrator of the Office of New Jersey Heritage (the SHPO), Summer, 1991.

⁸ These projects vary in what they entail. In Paterson, the money will be spent on documentation, analysis of data, and the development and implementation of a preservation plan for the city. The New Jersey appropriations come through the National Park Service as part of a nationwide Urban History Initiative. (Information based on conversations with Dan Saunders, Senior Historic Preservation Specialist and Office of New Jersey Heritage liaison to these Urban History projects and Terry Karschner, Supervising Historic Preservation Specialist in charge of the National Register and Planning Section)

⁹ New Jersey State Planning Commission, "Communities of Place: The Interim State Development and Redevelopment Plan for the State of New Jersey," (Trenton, July 12, 1991).

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